PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY
and HAMMOND DEPARTMENT
of ENVIRONMENTAL MANAGEMENT

Dover Chemical – Hammond Works
3000 SHEFFIELD AENUE,
HAMMOND, IN 46327

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

(Herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 089-7797-00227	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 19,2004 Expiration Date: March 19, 2009

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Hammond Department of Environmental Management (HDEM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary chlorinated Paraffin manufacturing plant.

Responsible Official:	David L. Rankin, Vice President, Environmental Affairs
Source Address:	3000 Sheffield Avenue, Hammond, IN 46327
Mailing Address:	3000 Sheffield Avenue, Hammond, IN 46327
SIC Code:	2899
County Location:	Lake
Source Location Status:	Non attainment for ozone, and PM10 Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD and Emission Offset Rules; 1 of 28 Source Categories Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]

[326 IAC 2-7-5(15)]
This stationary source consists of the following emission units and pollution control devices:

SECTION D.1

(a) Group of Boilers

(1) One (1) Cleaver brooks natural gas fired boiler, Model CB-300HP, identified as B-4, constructed in 1974, rated at 12.55 MMBtu per hour, and exhausting at one (1) stack, identified as GB-3401.

(2) One (1) Cleaver brooks natural gas fired boiler, Model CB-200-500, identified as B-5, constructed in 1980, rated at 20.92 MMBtu per hour, and exhausting at one (1) stack, identified as GB-3402.

(3) One (1) Superior–Mohawk natural gas fired boiler, identified as B-6, constructed in 1988, rated at 20 MMBtu per hour, and exhausting at one (1) stack, identified as GB-3403. identified as B-4.

SECTION D.2 Chlorination system

with a maximum rated capacity of 5,000 pounds per hour of chlorinated metal working products, 10,000 pounds per hour of chlorinated polybutene intermediate products, and 8,300 pounds per hour of muriatic acid consisting of the following equipment:

(b) The system consisting of

(1) Nine (9) reactors, identified as TR-2001 (constructed before 1976), 2003 (constructed before 1976), 2004 (constructed before 1976), 2005 (constructed before

1976), 2006 (constructed before 1976), 2007 (constructed in 1977), 2008 (constructed in 1977) 2010 (constructed in 1983), and 2014 (constructed in 1990), and with a maximum capacity of 2,000 gallons each;

(2) Five (5) reactors, identified as TR-2002 (constructed in 1988), 2009 (constructed in 1982), 2015 (constructed in 1990), 2016 (constructed in 1990), and 2017 (constructed in 1993), and with a maximum capacity of 4,000 gallons each;

(3) One (1) sulfur monochloride tank, identified as TS-1058, constructed in 1981, and with a maximum capacity of 5,470 gallons;

(4) One (1) acid tower condensate neutralization tank, identified as TP-2030, constructed before 1976, and with a maximum capacity of 500 gallons;

(5) Two (2) chlorine railcar track spots, identified as RC-0101 and RC-0201, constructed before 1976, and with a maximum capacity of 1 railcar (containing at most 180,600 pounds) each;

(6) One (1) acid tower, identified as CB-2060, constructed before 1976, and with a maximum capacity of 8,300 lb/hr muriatic acid;

(7) One (1) tower product acid tank, identified as TP-2033, constructed before 1976, and with a maximum capacity of 560-gallons;

(8) One (1) tower water feed tank, identified as TP-2060 (constructed in 1996), and with a maximum capacity of 560-gallons; and

(9) Two (2) Chlorine vaporizers, identified as XV-2050 and XV-2051, constructed before 1976, and with a maximum capacity of 7,000 lb/hr Chlorine;

all controlled by seven (7) scrubbers identified as TP-2061 (constructed before 1976), TP-2062 (constructed before 1976), TP-2063 (constructed before 1976), TP-2064 (constructed before 1976), TP-2065 (constructed in 1977), TP-2066 (constructed in 1977), and TP-2067 (constructed in 1995), and exhausting at seven (7) stacks, identified as Stacks TP-2061 to 2067.

(c) The system consisting of

(1) Three (3) muriatic acid tanks, identified as TS-1090 (constructed in 1979), TS-1091(constructed in 1980), and TS-1093 (constructed in 2000), and with a maximum capacity of 14,900, 16,000, and 16,000 gallons, respectively;

(2) Two (2) hypochlorite reduction tanks, identified as TP-3494, and TP-3495 (constructed in 1993), and with a maximum capacity of 6,250 gallons each;

(3) Two (2) chlorinated polybutene storage tanks, identified as TS-1019, and TS-1023 (constructed in 1997), and with a maximum capacity of 27,950 gallons each; and

(4) One (1) muriatic acid tank truck loading station, constructed in 1979, and with a maximum capacity of 1 truck;

controlled by one (1) caustic scrubber identified as TP-1030 constructed in 1980 exhausting at one (1) stack, identified as Stack TP-1030.

(d) The system consisting of

(1) One (1) chlorinated product tank, identified as TS-2041, constructed before 1976, with a maximum capacity of 4,000 gallons;

(2) Two (2) chlorinated product tanks, identified as TS-2043, and TS-2044, constructed before 1976, and with a maximum capacity of 4,100 gallons each; and

(3) One (1) chlorinated product-drumming tank, identified as TS-2012, constructed in 1978, and with a maximum capacity of 1,500 gallons.

SECTION D.3 Sulfurization system

with a maximum rated capacity of 6,000 pounds per hour of sulfurized products consisting of the following equipment:

(e) The system consisting of

(1) Three (3) Sulfurization reactors, identified as TR-2120, 2121, and 2123, constructed before 1976, with maximum capacity of 3,700, 3,700, and 7,500 gallons, respectively, controlled by two (2) caustic scrubbers, identified as TP-2162 and TP-2163 and exhausting at Stack TP-2163.

(2) Five (5) blowing tanks, identified as TP-2150 (constructed in 1977), 2151 (constructed in 1977), 2152 (constructed in 1977), 2153 (constructed in 1977); and 2154 (constructed in 1997), with maximum capacity of 11,000, 9,650, 11,500, 4,000, and 7,600 gallons, respectively, venting to a blowing tank knockout tank identified as TP-2159; controlled by two (2) caustic scrubbers, identified as TP-2162 and TP-2163 and exhausting at Stack TP-2163.

□□□ One (1) knockout storage tank, identified as TP-2164, constructed in 1976, with a maximum capacity of 1,500 gallons, exhausted to a caustic slop tank, identified as TP-2167, constructed in 1995, and exhausting at Stack TP-2167.

(4) One (1) scrubber liquor storage tank, identified as TS-1029, constructed in 1979, and with a maximum capacity of 15,880 gallons.

SECTION D.4 Hi-Temp System

with a maximum rated capacity of 4,200 pounds per hour of hi-temp products consisting of the following equipment:

(f) The system consisting of

(1) Two (2) reactors, identified as TR-2320 and TR-2630, constructed in 1989, and 1990, respectively, and with a maximum capacity of 4,000 gallons each;

(2) Two (2) recovered methanol tanks, identified as TS-2602 and TS-2603, constructed in 1989, and with maximum capacity of 2,500, and 4,000 gallons, respectively;

(3) One (1) sludge tank, identified as TP-2604, constructed in 1989, and with a maximum capacity of 750 gallons;

(4) One (1) scrubber liquor tank, identified as TS-2610, constructed in 2001, and with a maximum capacity of 10,000 gallons; and

(5) One (1) intermediate holding tank, identified as TP-2601, constructed in 1989, and with a maximum capacity of 4,550 gallons;

controlled by two (2) caustic scrubbers identified as TP-2624 and TP-2626, constructed in 1989; and one flare, identified as GG-2627, constructed in 1990, in series, and exhausting at one (1) stack, identified as Stack GG-2627. Alternately, the reactors identified in item (f.1) can be controlled by one (1) scrubber identified as TP-2636, constructed in 1990; and exhausting at one (1) stack identified as Stack TP-2636.

(g) One (1) Scrubber liquor truck loading station, constructed in 1989 controlled by a carbon drum, identified as TF-2610 constructed in 2001.

(h) A filtration system consisting of

(1) One (1) pre-coat tank, identified as TP-2722, constructed in 1995, and with a maximum capacity of 1,300 gallons;

(2) One (1) filter feed tank, identified as TP-2720, constructed in 1995, and with a maximum capacity of 5,000 gallons;

(3) One (1) filtrate tank, identified as TP-2730, constructed in 1995, and with a maximum capacity of 5,000 gallons; and

(4) One (1) filter, identified as GF-2741, constructed in 1995, and with a maximum capacity of 69 cubic feet of filter cake;

controlled by a carbon drum, identified as GF-2728, and exhausting at a stack, identified as Stack GF-2728.

SECTION D.5 Fuel Additive system

with a maximum rated capacity of 12,000 pounds per hour of fuel additives (prior to blending) consisting of the following equipment:

(i) The system consisting of

(1) Nine (9) reactors, identified as TR-2001 (constructed before 1976), 2003 (constructed before 1976), 2004 (constructed before 1976), 2005 (constructed before 1976), 2006 (constructed before 1976), 2007 (constructed in 1977), 2008 (constructed in 1977) 2010 (constructed in 1983), and 2014 (constructed in 1990), and with a maximum capacity of 2,000 gallons each;

(2) Five (5) reactors, identified as TR-2002 (constructed in 1988), 2009 (constructed in 1982), 2015 (constructed in 1990), 2016 (constructed in 1990), and 2017 (constructed in 1993), and with a maximum capacity of 4,000 gallons each;

(3) One (1) EDA recycle tank, identified as TS-2052 (constructed in 1985), and with a maximum capacity of 1,700 gallons;

controlled by a scrubber identified as TP-2072 (constructed in 1985), and exhausting at a stack identified as Stack TP-2072.

(j) One (1) virgin EDA tank, identified as TS-1027, (constructed in 1985), maximum capacity of 14,930 gallons, controlled by a carbon adsorption drum identified as GF-1029, and exhausting at stack identified as Stack GF-1029.

(k) Two (2) continuous wash systems and two (2) stripping columns identified as CD-2319

(constructed in 1985) and CD-2350 (constructed in 1990), controlled by two (2) vent condensers identified as XT-2313, and XT-2350, and exhausting at stacks identified as Stack XT-2313, and Stack XT-2350.

(l) Two (2) solvent storage tanks, identified asTS-1026 (constructed in 1985), and TS-2318 (constructed in 1990), and maximum capacity of 28,760, and 10,570 gallons, respectively.

(m) Four- (4) product rundown tanks, and identified as TS-1035, TS-1036 (both constructed in 1985), TP-2360, and TP-2361 (both constructed in 1990), and maximum capacity of 6,800 gallons each.

(n) Three (3) fuel additive blending tanks, identified as TS-1030, TS-1031, and TS-1032 (all constructed in 1985), and maximum capacity of 11,240, 15,220, and 11,740 gallons, respectively.

SECTION D.6 Miscellaneous system

With a maximum rated capacity of 3,000 pounds per hour consisting of the following equipment:

(o) Five reactors, identified as TR-2224 (constructed in 1980), 2225 (constructed before 1976), 2226 (constructed before 1976), 2227 (constructed before 1976), and 2228 (constructed before 1976), maximum capacity of 5,500, 2,000, 7,000, 400, and 7,500 gallons, respectively; controlled by two (2) wet scrubbers, identified as PE-2228, and TP-2332, and exhausting at stacks identified as Stack PE-2228, and Stack TP-2332.

(p) Two (2) reactors, identified as TR-2329 (constructed in 1986), and TR-2322 (constructed in 1984), maximum capacity of 1,500, and 2,000 gallons, respectively, controlled by a demister (constructed in 1989), identified as TP-2322 and exhausting at stack, identified as Stack TP-2322.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]

This stationary source also includes the following insignificant activities, which are specifically regulated, as defined in 326 IAC 2-7-1(21):

SECTION D.7 VOC STORAGE TANKS

(q) Storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC. [326 IAC 12, and 40 CFR 60.112b(a)]

(1) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1001, constructed in 1997.

(2) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1002, constructed in 1997.

(3) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1003, constructed in 1993.

(4) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1004, constructed in 1978.

(5) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1005, constructed in 1978.

(6) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1006, constructed in 1978.

(7) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1007, constructed in 1978.

(8) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1008, constructed in 1978.

(9) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1009, constructed in 1978.

(10) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1010, constructed in 1978.

(11) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1011, constructed in 1978.

(12) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1012, constructed in 1978.

(13) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1013, constructed in 1978.

(14) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1014, constructed in 1978.

(15) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1015, constructed in 1987.

(16) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1016, constructed in 1978.

(17) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1017, constructed in 1978.

(18) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1018, constructed in 1978.

(19) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1019, constructed in 1996.

(20) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1020, constructed in 1997.

(21) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1021, constructed in 1997.

(22) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1022, constructed in 1996.

(23) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1023, constructed in 1996.

(24) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1024, constructed in 1997.

(25) One (1) storage tank, maximum capacity of 28,760 gallons, identified as TS-1026, constructed in 1980.

(26) One (1) storage tank, maximum capacity of 14,930 gallons, identified as TS-1027, constructed in 1989.

(27) One (1) storage tank, maximum capacity of 11,075 gallons, identified as TS-1028, constructed in 1980.

(28) One (1) storage tank, maximum capacity of 15,880 gallons, identified as TS-1029, constructed in 1980.

(29) One (1) blend tank, maximum capacity of 11,740 gallons, identified as TS-1030, constructed in 1986.

(30) One (1) blend tank, maximum capacity of 15,220 gallons, identified as TS-1031, constructed in 1986.

(31) One (1) blend tank, maximum capacity of 11,740 gallons, identified as TS-1032, constructed in 1986.

(32) One (1) POBA storage tank, maximum capacity of 15,220 gallons, identified as TS-1033, constructed in 1986.

(33) One (1) storage tank, maximum capacity of 15,380 gallons, identified as TS-1039, constructed in 1987.

(34) One (1) storage tank, maximum capacity of 15,380 gallons, identified as TS-1040, constructed in 1987.

(35) One (1) blend tank, maximum capacity of 15,540 gallons, identified as TS-1042, constructed in 1989.

(36) One (1) storage or blend tank, maximum capacity of 14,900 gallons, identified as TS-1043, constructed in 1990.

(37) One (1) wax storage tank, maximum capacity of 20,390 gallons, identified as TS-1056, constructed in 1978.

(38) One (1) storage tank, maximum capacity of 20,390 gallons, identified as TS-1057, constructed in 1978.

(39) One (1) storage tank, maximum capacity of 4,010 gallons, identified as TS-1081, constructed in 1989.

(40) One (1) storage tank, maximum capacity of 15,220 gallons, identified as TS-1082, constructed in 1989.

(41) One (1) storage tank, maximum capacity of 1,320 gallons, identified as TS-1083, constructed in 1976.

(42) One (1) storage tank, maximum capacity of 10,360 gallons, identified as TS-2160, constructed before 1976.

(43) One (1) storage tank, maximum capacity of 10,360 gallons, identified as TS-2163, constructed before 1976.

(44) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2168, constructed before 1976.

(45) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2169, constructed before 1976.

(46) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2170, constructed before 1976.

(47) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2178, constructed in 1998.

(48) One (1) storage tank, maximum capacity of 2,600 gallons, identified as TS-2209,

constructed before 1979.

(49) One (1) storage tank, maximum capacity of 10,800 gallons, identified as TS-2218, constructed before 1979.

(50) One (1) storage tank, maximum capacity of 10,690 gallons, identified as TS-2251, constructed before 1976.

(51) One (1) storage tank, maximum capacity of 6,760 gallons, identified as TS-2253, constructed before 1976.

(52) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2255, constructed before 1976.

(53) One (1) storage tank, maximum capacity of 10,360 gallons, identified as TS-2264, constructed before 1979.

(54) One (1) storage tank, maximum capacity of 31,070 gallons, identified as TS-2265, constructed before 1979.

(55) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2275, constructed before 1979.

(56) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2276, constructed before 1979.

(57) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2277, constructed before 1976.

(58) One (1) storage tank, maximum capacity of 3,450 gallons, identified as TS-2279, constructed before 1976.

(59) One (1) storage tank, maximum capacity of 3,450 gallons, identified as TS-2280, constructed before 1976.

(60) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2305, constructed in 1990.

(61) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2315, constructed in 1990.

(62) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2318, constructed in 1990.

(63) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2362, constructed in 1990.

(64) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2364, constructed in 1990.

(65) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2365, constructed in 1990.

(66) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2367, constructed in 1990.

(67) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2606, constructed in 1989.

(68) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2610, constructed in 1990.

(69) One (1) storage tank, maximum capacity of 4,760 gallons, identified as TS-2612, constructed in 1990.

(70) One (1) storage tank, maximum capacity of 30,080 gallons, identified as TS-2613, constructed in 1990.

(71) One (1) storage tank, maximum capacity of 16,920 gallons, identified as TS-2619, constructed in 1990.

SECTION D.8 5.7 MMBtu/hr Boiler

(r) One (1) natural gas fired boiler, Model, identified as boiler no. B-3, constructed in 1974, rated at 5.7 MMBtu per hour, exhausting at one (1) stack, identified as GB-3403.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B **GENERAL CONDITIONS**

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and HDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by HDEM.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, and HDEM within a reasonable time, any information that IDEM, OAQ, HDEM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and HDEM, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each

submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and HDEM on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(1) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and HDEM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)] [326 IAC 2-7-6(1) and (6)]

[326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, and HDEM upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and HDEM. IDEM, OAQ, and HDEM may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and HDEM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (asks for Compliance Section)
Facsimile Number: 317-233-5967
Telephone Number: (219) 853-6306
Facsimile Number: (219) 853-6343 (FAX)

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification, which shall be submitted by the Permittee, does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, and HDEM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, and HDEM by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements, which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, or HDEM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or HDEM has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or HDEM has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) This permit supersedes all previous registrations and permits.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.
The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-

5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or HDEM determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, or HDEM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or HDEM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or HDEM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and HDEM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and HDEM on or before the date it is due.

(2) If IDEM, OAQ, and HDEM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, and HDEM**,** takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and HDEM**,** any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, and HDEM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

And

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Permit Revision under Economic Incentives and other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions, which exceed the emissions allowable under this, permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and HDEM in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification, which shall be submitted, is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and HDEM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1,utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring

compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

The application, which shall be submitted by the Permittee, does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, and HDEM within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, and HDEM the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (asks for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or

more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), and 326 IAC 1-7-4(a), (b), and (d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34). The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes

or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.
A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and HDEM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and HDEM if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification, which shall be submitted by the Permittee, does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3] Pursuant to 326 IAC 1-5-2

(Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on August 29, 1996.

(b) If the ERP is disapproved by IDEM, OAQ, and HDEM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(c) Upon direct notification by IDEM, OAQ, and HDEM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68:

(a) A Risk Management Plan was prepared as required by 40 CFR 68 and submitted to U.S. EPA. U.S. EPA received the RMP on June 21, 1999.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, and HDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.

The OMM Plan (or Parametric Monitoring and SMM Plan) shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan

(or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan); or

(2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

[326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the

Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6] [326 IAC 2-7-19 (e)]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:

(1) Indicate estimated actual emissions of criteria pollutants from the source;

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1(32)) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other

means, it shall be considered timely if received by IDEM, OAQ, and HDEM on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and HDEM on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on Calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

C.22 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 2 Maximum Achievable Control Technology (MACT) Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:

(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;

(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or

(3) The MACT standard or standards for the affected source categories included at the source are promulgated.

(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Facility Description [326 IAC 2-7-5(15)]:

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

(a) Group of Boilers

(1) One (1) Cleaver brooks natural gas fired boiler, Model CB-300HP, identified as B-4, constructed in 1974, rated at 12.55 MMBtu per hour, and exhausting at one (1) stack, identified as GB-3401.

(2) One (1) Cleaver brooks natural gas fired boiler, Model CB-200-500, identified as B-5, constructed in 1980, rated at 20.92 MMBtu per hour, and exhausting at one (1) stack, identified as GB-3402.

(3) One (1) Superior–Mohawk natural gas fired boiler, identified as B-6, constructed in 1988, rated at 20 MMBtu per hour, and exhausting at one (1) stack, identified as GB-3403. identified as B-4.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter Limitation (PM_{10}) [326 IAC 6-1-10.1] [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-1-10.1(20) (Lake County PM_{10} emission requirements) PM_{10} emissions from the Cleaver Brooks boiler B-4 (Stack GB-3401) shall be limited to seven-thousandths (0.007) pounds per million Btu, and 0.09 pounds per hour.

(b) Pursuant to 326 IAC 6-1-10.1(20) (Lake County PM_{10} emission requirements) PM_{10} emissions from the Cleaver Brooks boiler B-5 (Stack GB-3402) shall be limited to seven-thousandths (0.007) pounds per million Btu, and 0.14 pounds per hour.

(c) Pursuant to 326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d)) the particulate emissions from the combustion of natural gas from boiler B-6 (Stack GB-3403 shall be limited to 0.387 pounds per million Btu, and 7.44 pounds per hour.

The above limit is established by the following equation:

$$Pt = (1.09)/(Q^{0.26})$$

Where:

Pt	=	Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q	=	Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Chlorination process with a maximum rated capacity of 5,000 pounds per hour of chlorinated metal working products, 10,000 pounds per hour of chlorinated polybutene intermediate products, and 8,300 pounds per hour of muriatic acid consisting of the following equipment:

(b) The system consisting of

(1) Nine (9) reactors, identified as TR-2001 (constructed before 1976), 2003 (constructed before 1976), 2004 (constructed before 1976), 2005 (constructed before 1976), 2006 (constructed before 1976), 2007 (constructed in 1977), 2008 (constructed in 1977) 2010 (constructed in 1983), and 2014 (constructed in 1990), and with a maximum capacity of 2,000 gallons each;

(2) Five (5) reactors, identified as TR-2002 (constructed in 1988), 2009 (constructed in 1982), 2015 (constructed in 1990), 2016 (constructed in 1990), and 2017 (constructed in 1993), and with a maximum capacity of 4,000 gallons each;

(3) One (1) sulfur monochloride tank, identified as TS-1058, constructed in 1981, and with a maximum capacity of 5,470 gallons;

(4) One (1) acid tower condensate neutralization tank, identified as TP-2030, constructed before 1976, and with a maximum capacity of 500 gallons;

(5) Two (2) chlorine railcar track spots, identified as RC-0101 and RC-0201, constructed before 1976, and with a maximum capacity of 1 railcar (containing at most 180,600 pounds) each;

(6) One (1) acid tower, identified as CB-2060, constructed before 1976, and with a maximum capacity of 8,300-lb/hr muriatic acid;

(7) One (1) tower product acid tank, identified as TP-2033, constructed before 1976, and with a maximum capacity of 560-gallons;

(8) One (1) tower water feed tank, identified as TP-2060 (constructed in 1996), and with a maximum capacity of 560-gallons; and

(9) Two (2) Chlorine vaporizers, identified as XV-2050 and XV-2051, constructed before 1976, and with a maximum capacity of 7,000 lb/hr Chlorine;

all controlled by seven (7) scrubbers identified as TP-2061 (constructed before 1976), TP-2062 (constructed before 1976), TP-2063 (constructed before 1976), TP-2064 (constructed before 1976), TP-2065 (constructed in 1977), TP-2066 (constructed in 1977), and TP-2067 (constructed in 1995), and exhausting at seven (7) stacks, identified as Stacks TP-2061 to 2067.

(c) The system consisting of

(1) Three (3) muriatic acid tanks, identified as TS-1090 (constructed in 1979), TS-1091(constructed in 1980), and TS-1093 (constructed in 2000), and with a maximum capacity of 14,900, 16,000, and 16,000 gallons, respectively;

(2) Two (2) hypochlorite reduction tanks, identified as TP-3494, and TP-3495 (constructed in 1993), and with a maximum capacity of 6,250 gallons each;

(3) Two (2) chlorinated polybutene storage tanks, identified as TS-1019, and TS-1023 (constructed in 1997), and with a maximum capacity of 28,000 gallons each; and

(4) One (1) muriatic acid tank truck loading station, constructed in 1979, and with a maximum capacity of 1 truck;

controlled by one (1) caustic scrubber identified as TP-1030 constructed in 1980 exhausting at one (1) stack, identified as Stack TP-1030.

(d) The system consisting of

(1) One (1) chlorinated product tank, identified as TS-2041, constructed before 1976, with a maximum capacity of 4,000 gallons;

(2) Two (2) chlorinated product tanks, identified as TS-2043, and TS-2044, constructed before 1976, and with a maximum capacity of 4,100 gallons each; and

(3) One (1) chlorinated product-drumming tank, identified as TS-2012, constructed in 1978, and with a maximum capacity of 1,500 gallons.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Lake County PM_{10} Emission Requirements [326 IAC 6-1-10.1] [326 IAC 6-1-5]

Pursuant to 326 IAC 6-1-10.1(d) (20), the allowable PM_{10} emission rate from the Chlorination process shall not exceed 0.001 pounds per ton, and 0.003 pounds per hour. Pursuant to 326 IAC 6-1-5(d), the Chlorination process shall comply with both limits.

D.2.2 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]

Pursuant to 326 IAC 8-9, the Permittee shall maintain a record and submit to Compliance Branch, OAQ, IDEM a report containing the following information:

(a) The vessel identification number

(b) The vessels dimension

(c) The vessel capacity

for each of the following vessels.

(1) TS-2012
(2) TS-2041
(3) TS-2043
(4) TS-2044

D.2.3 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

(a) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the hydrochloric acid production, as an affected source, as designated

by 40 CFR 63.8985, except when otherwise specified in 40 CFR 63 Subpart NNNNN. The Permittee must comply with these requirements on and after April 17, 2003.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.2.4 National Emissions Standards for Hazardous Air Pollutants for Hydrochloric Acid Manufacturing [40 CFR Part 63, Subpart NNNNN]

(a) The affected source, the hydrochloric production facility is the collection of unit operations and equipment associated with production of liquid hydrochloric acid (HCl) product at a concentration of 30 weight percent or greater during its normal operations, is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hydrochloric Acid Manufacturing [40 CFR Part 63, Subpart NNNNN]. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart NNNNN no later than 3 years after April 17, 2003, or accept to and meet an enforceable HAP emissions limit below the major source threshold prior to three years after April 17, 2003. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(b) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart NNNNN:

(1) CS 2060 Hydrochloric Acid Tower
(2) TP-2060 Acid Tower Feed Water Tank
(3) TP-2033 Hydrochloric Acid Tower Product Tank
(4) TP-2061, 2062, 2065 & 2066 Scrubbers (TP 2065 and TP 2066 are back up scrubbers).
(5) TP-1030 Tank Farm Acid Loading Scrubber
(6) TS 1090, 1091, 1093 Muriatic Acid Storage Tanks (three storage tanks)
(7) The hydrochloric acid vent line going from the tank wagon over to the Tank Farm Scrubber TP-1030

Record Keeping and Reporting Section:

D.2.5 National Emissions Standards for Hazardous Air Pollutants for Hydrochloric Acid Manufacturing - Notification Requirements [40 CFR 63, Subpart NNNNN]

Pursuant to 40 CFR 63.9045,

(a) the Permittee shall submit all of the notifications in Sec. Sec. 63.7(b) and (c), 63.8(f)(4) and (6), and 63.9 (b) through (h) that apply to this source by the dates specified;

(b) As specified in Sec. 63.9(b)(2), the Permittee shall submit an Initial Notification not later than 120 calendar days after April 17, 2003;

(c) the Permittee shall submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, as required in Sec. 63.7(b)(1);

(d) If a performance test is required as specified in Table 3 to this subpart, the Permittee shall submit a Notification of Compliance Status according to Sec. 63.9(h)(2)(ii);

(e) the Permittee shall submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th calendar day following the completion of the performance test according to Sec. 63.10(d)(2); and

(f) the Notification of Compliance Status shall also include the information in paragraph (f)(1) through (2) of this section

(1) each operating parameter value averaged over the full period of the performance test (for example, average pH).

(2) each operating parameter range within which HAP emissions are reduced to the level corresponding to meeting the applicable emission limits in Table 1 to this subpart.

(g) The notifications required by paragraphs (a) through (b) shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

The notifications require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.2.6 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart NNNNN, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven months after April 17, 2003.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management

Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

Facility Description [326 IAC 2-7-5(15)]:

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Sulfurization process- with a maximum rated capacity of 6,000 pounds per hour of sulfurized products consisting of the following equipment:

(e) The system consisting of

(1) Three (3) Sulfurization reactors, identified as TR-2120, 2121, and 2123, constructed before 1976, with maximum capacity of 3,700, 3,700, and 7,500 gallons, respectively, controlled by two (2) caustic scrubbers, identified as TP-2162 and TP-2163 and exhausting at Stack TP-2163.

(2) Five (5) blowing tanks, identified as TP-2150 (constructed in 1977), 2151 (constructed in 1977), 2152 (constructed in 1977), 2153 (constructed in 1977); and 2154 (constructed in 1997), with maximum capacity of 11,000, 9,650, 11,500, 4,000, and 7,600 gallons, respectively, venting to a blowing tank knockout tank identified as TP-2159; controlled by two (2) caustic scrubbers, identified as TP-2162 and TP-2163 and exhausting at Stack TP-2163.

(3) One (1) knockout storage tank, identified as TP-2164, constructed in 1976, with a maximum capacity of 1,500 gallons, exhausted to a caustic slop tank, identified as TP-2167, constructed in 1995, and exhausting at Stack TP-2167.

(4) One (1) scrubber liquor storage tank, identified as TS-1029, constructed in 1979, and with a maximum capacity of 16,000 gallons.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Lake County PM_{10} Emission Requirements [326 IAC 6-1-10.1.1] [326 IAC 6-1-5]

Pursuant to 326 IAC 6-1-10.1-20, the allowable PM_{10} emission rate from the Sulfurization process shall not exceed 0.157 pounds per ton, and 0.23 pounds per hour. Pursuant to 326 IAC 6-1-5(d), the Sulfurization process shall comply with both limits.

Facility Description [326 IAC 2-7-5(15)]:

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Hi-Temp process - with a maximum rated capacity of 4,200 pounds per hour of hi-temp products consisting of the following equipment:

(f) The system consisting of

(1) Two (2) reactors, identified as TR-2320 and TR-2630, constructed in 1989, and 1990, respectively, and with a maximum capacity of 4,000 gallons each;

(2) Two (2) recovered methanol tanks, identified as TS-2602 and TS-2603, constructed in 1989, and with maximum capacity of 2,500, and 4,000 gallons, respectively;

(3) One (1) sludge tank, identified as TP-2604, constructed in 1989, and with a maximum capacity of 750 gallons;

(4) One (1) scrubber liquor tank, identified as TS-2610, constructed in 2001, and with a maximum capacity of 10,000 gallons; and

(5) One (1) intermediate holding tank, identified as TP-2601, constructed in 1989, and with a maximum capacity of 4,550 gallons;

controlled by two (2) caustic scrubbers identified as TP-2624 and TP-2626, constructed in 1989; and one flare, identified as GG-2627, constructed in 1990, in series, and exhausting at one (1) stack, identified as Stack GG-2627. Alternately, the reactors identified in item (f.1) can be controlled by one (1) scrubber identified as TP-2636, constructed in 1990; and exhausting at one (1) stack identified as Stack TP-2636.

(g) One (1) scrubber liquor truck loading station, constructed in 1989 controlled by a carbon drum, identified as TF-2610 constructed in 2001.

(h) A filtration system consisting of

(1) One (1) pre-coat tank, identified as TP-2722, constructed in 1995, and with a maximum capacity of 1,300 gallons;

(2) One (1) filter feed tank, identified as TP-2720, constructed in 1995, and with a maximum capacity of 5,000 gallons;

(3) One (1) filtrate tank, identified as TP-2730, constructed in 1995, and with a maximum capacity of 5,000 gallons; and

(4) One (1) filter, identified as GF-2741, constructed in 1995, and with a maximum capacity of 69 cubic feet of filter cake;

controlled by a carbon drum, identified as GF-2728, and exhausting at a stack, identified as Stack GF-2728.

D.4.1 Particulate Emissions Limitations, Work Practices and Control Technologies- Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3(e)(3) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Hi-Temp reactors shall be limited as follows:

Process/Facility	Reactors	Process Weight Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Hi-Temp Process	TR-2620	0.187	1.33
	TR-2630	0.187	1.33
	Filtration	0.234	1.55

The pounds per hour limitation was calculated using the following equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Facility Description [326 IAC 2-7-5(15)]:

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Fuel Additive Process - with a maximum rated capacity of 12,000 pounds per hour of fuel additives (prior to blending) consisting of the following equipment:

(i) The system consisting of

(1) Nine (9) reactors, identified as TR-2001 (constructed before 1976), 2003 (constructed before 1976), 2004 (constructed before 1976), 2005 (constructed before 1976), 2006 (constructed before 1976), 2007 (constructed in 1977), 2008 (constructed in 1977) 2010 (constructed in 1983), and 2014 (constructed in 1990), and with a maximum capacity of 2,000 gallons each;

(2) Five (5) reactors, identified as TR-2002 (constructed in 1988), 2009 (constructed in 1982), 2015 (constructed in 1990), 2016 (constructed in 1990), and 2017 (constructed in 1993), and with a maximum capacity of 4,000 gallons each;

(3) One (1) EDA recycle tank, identified as TS-2052 (constructed in 1985), and with a maximum capacity of 1,700 gallons;

controlled by a scrubber identified as TP-2072 (constructed in 1985), and exhausting at a stack identified as Stack TP-2072.

(j) One (1) virgin EDA tank, identified as TS-1027, (constructed in 1985), maximum capacity of 12,000 gallons, controlled by a carbon adsorption drum identified as GF-1029, and exhausting at stack identified as Stack GF-1029.

(k) Two (2) continuous wash systems and two (2) stripping columns identified as CD-2319 (constructed in 1985) and CD-2350 (constructed in 1990), controlled by two (2) vent condensers identified as XT-2313, and XT-2350, and exhausting at stacks identified as Stack XT-2313, and Stack XT-2350.

(l) Two (2) solvent storage tanks, identified asTS-1026 (constructed in 1985), and TS-2318 (constructed in 1990), and maximum capacity of 28,800, and 10,000 gallons, respectively.

(m) Four (4) product rundown tanks, and identified as TS-1035, TS-1036 (both constructed in 1985), TP-2360, and TP-2361 (both constructed in 1990), and maximum capacity of 6,800 gallons each.

(n) Three (3) fuel additive blending tanks, identified as TS-1030, TS-1031, and TS-1032 (all constructed in 1985), and maximum capacity of 10,150, 14,900, and 10,150 gallons, respectively.

There are no applicable requirements for these facilities.

Facility Description [326 IAC 2-7-5(15)]:

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Miscellaneous Process - with a maximum rated capacity of 3,000 pounds per hour consisting of the following equipment:

The system consisting of

(o) Five reactors, identified as TR-2224 (constructed in 1980), 2225 (constructed before 1976), 2226 (constructed before 1976), 2227 (constructed before 1976), and 2228 (constructed before 1976), maximum capacity of 5,500, 2,000, 7,000, 400, and 7,500 gallons, respectively; controlled by two (2) wet scrubbers, identified as PE-2228, and TP-2332, and exhausting at stacks identified as Stack PE-2228, and Stack TP-2332.

(p) Two (2) reactors, identified as TR-2329 (constructed in 1986), and TR-2322 (constructed in 1984), maximum capacity of 1,500, and 2,000 gallons, respectively, controlled by a demister (constructed in 1989), identified as TP-2322 and exhausting at stack, identified as Stack TP-2322.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Emissions Limitations, Work Practices and Control Technologies- Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3(e)(3) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Miscellaneous reactors shall be limited as follows:

Process/Facility	Reactors	Process Weight Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Miscellaneous Process	TR-2224	8.0	16.5
	TR-2225	2.909	8.38
	TR-2226	10.182	19.4
	TR-2227	0.582	2.85
	TR-2228	10.909	20.3
	TR-2329	2.182	6.92
	TR-2322	2.90	8.38

The pounds per hour limitation was calculated using the following equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

Facility Description [326 IAC 2-7-5(15)]: Specifically Regulated Insignificant Activities

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Specifically regulated insignificant activities with emissions below significant thresholds:

(q) Storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC.

(1) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1001, constructed in 1997.

(2) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1002, constructed in 1997.

(3) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1003, constructed in 1993.

(4) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1004, constructed in 1978.

(5) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1005, constructed in 1978.

(6) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1006, constructed in 1978.

(7) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1007, constructed in 1978.

(8) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1008, constructed in 1978.

(9) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1009, constructed in 1978.

(10) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1010, constructed in 1978.

(11) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1011, constructed in 1978.

(12) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1012, constructed in 1978.

(13) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1013, constructed in 1978.

(14) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1014, constructed in 1978.

(15) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1015,

constructed in 1987.

(16) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1016, constructed in 1978.

(17) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1017, constructed in 1978.

(18) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1018, constructed in 1978.

(19) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1019, constructed in 1996.

(20) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1020, constructed in 1997.

(21) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1021, constructed in 1997.

(22) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1022, constructed in 1996.

(23) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1023, constructed in 1996.

(24) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1024, constructed in 1997.

(25) One (1) storage tank, maximum capacity of 28,760 gallons, identified as TS-1026, constructed in 1980.

(26) One (1) storage tank, maximum capacity of 14,930 gallons, identified as TS-1027, constructed in 1989.

(27) One (1) storage tank, maximum capacity of 11,075 gallons, identified as TS-1028, constructed in 1980.

(28) One (1) storage tank, maximum capacity of 15,880 gallons, identified as TS-1029, constructed in 1980.

(29) One (1) blend tank, maximum capacity of 11,740 gallons, identified as TS-1030, constructed in 1986.

(30) One (1) blend tank, maximum capacity of 15,220 gallons, identified as TS-1031, constructed in 1986.

(31) One (1) blend tank, maximum capacity of 11,740 gallons, identified as TS-1032, constructed in 1986.

(32) One (1) POBA storage tank, maximum capacity of 15,220 gallons, identified as TS-1033, constructed in 1986.

(33) One (1) storage tank, maximum capacity of 15,380 gallons, identified as TS-1039, constructed in 1987.

(34) One (1) storage tank, maximum capacity of 15,380 gallons, identified as TS-1040, constructed in 1987.

(35) One (1) blend tank, maximum capacity of 15,540 gallons, identified as TS-1042, constructed in 1989.

(36) One (1) storage or blend tank, maximum capacity of 14,900 gallons, identified as TS-1043, constructed in 1990.

(37) One (1) wax storage tank, maximum capacity of 20,390 gallons, identified as TS-1056, constructed in 1978.

(38) One (1) storage tank, maximum capacity of 20,390 gallons, identified as TS-1057, constructed in 1978.

(39) One (1) storage tank, maximum capacity of 4,010 gallons, identified as TS-1081, constructed in 1989.

(40) One (1) storage tank, maximum capacity of 15,220 gallons, identified as TS-1082, constructed in 1989.

(41) One (1) storage tank, maximum capacity of 1,320 gallons, identified as TS-1083, constructed in 1976.

(42) One (1) storage tank, maximum capacity of 10,360 gallons, identified as TS-2160, constructed before 1976.

(43) One (1) storage tank, maximum capacity of 10,360 gallons, identified as TS-2163, constructed before 1976.

(44) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2168, constructed before 1976, and vented to a scrubber.

(45) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2169, constructed before 1976 and vented to a scrubber.

(46) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2170, constructed before 1976 and vented to a scrubber.

(47) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2178, constructed in 1998.

(48) One (1) storage tank, maximum capacity of 2,600 gallons, identified as TS-2209, constructed before 1979.

(49) One (1) storage tank, maximum capacity of 10,800 gallons, identified as TS-2218, constructed before 1979.

(50) One (1) storage tank, maximum capacity of 10,690 gallons, identified as TS-2251, constructed before 1976.

(51) One (1) storage tank, maximum capacity of 6,760 gallons, identified as TS-2253, constructed before 1976.

(52) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2255, constructed before 1976.

(53) One (1) storage tank, maximum capacity of 10,360 gallons, identified as TS-2264, constructed before 1979.

(54) One (1) storage tank, maximum capacity of 31,070 gallons, identified as TS-2265, constructed before 1979.

(55) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2275, constructed before 1979.

(56) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2276, constructed before 1979.

(57) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2277, constructed before 1976.

(58) One (1) storage tank, maximum capacity of 3,450 gallons, identified as TS-2279, constructed before 1976.

(59) One (1) storage tank, maximum capacity of 3,450 gallons, identified as TS-2280,

constructed before 1976.

(60) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2305, constructed in 1990.

(61) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2315, constructed in 1990.

(62) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2318, constructed in 1990.

(63) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2362, constructed in 1990.

(64) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2364, constructed in 1990.

(65) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2365, constructed in 1990.

(66) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2367, constructed in 1990.

(67) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2606, constructed in 1989.

(68) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2610, constructed in 1990.

(69) One (1) storage tank, maximum capacity of 4,760 gallons, identified as TS-2612, constructed in 1990.

(70) One (1) storage tank, maximum capacity of 30,080 gallons, identified as TS-2613, constructed in 1990.

(71) One (1) storage tank, maximum capacity of 16,920 gallons, identified as TS-2619, constructed in 1990.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Volatile Organic Liquid Storage Vessels [326 IAC 12] [40 CFR 60, Part Kb]

Pursuant to 40 CFR 60.116b, the Permittee shall keep readily accessible records showing the dimensions of the storage tanks and an analysis showing the capacities of the following storage tanks.

(1) TS-1001
(2) TS-1002
(3) TS-1003
(4) TS-1019
(5) TS-1020
(6) TS-1021
(7) TS-1022
(8) TS-1023
(9) TS-1024
(10) TS-1027
(11) TS-1030
(12) TS-1031
(13) TS-1033
(14) TS-1039
(15) TS-1040

(16) TS-1042
(17) TS-1043
(18) TS-1082
(19) TS-2178
(20) TS-2305
(21) TS-2315
(22) TS-2318
(23) TS-2362
(24) TS-2364
(25) TS-2365
(26) TS-2367
(27) TS-2606
(28) TS-2610
(29) TS-2613
(30) TS-2619

D.7.2 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]

Pursuant to 326 IAC 8-9, the Permittee shall maintain a record and submit to Compliance Branch, OAQ, IDEM a report containing the following information:

(a) The vessel identification number

(b) The vessels dimension

(c) The vessel capacity

for each of the following vessels.

(1) TS-1004
(2) TS-1005
(3) TS-1006
(4) TS-1007
(5) TS-1008
(6) TS-1009
(7) TS-1010
(8) TS-1011
(9) TS-1012
(10) TS-1013
(11) TS-1014
(12) TS-1015
(13) TS-1016
(14) TS-1017
(15) TS-1018
(16) TS-1026
(17) TS-1028
(18) TS-1029
(19) TS-1032
(20) TS-1039
(21) TS-1056
(22) TS-1057
(23) TS-1083
(24) TS-2042
(25) TS-2160
(26) TS-2163
(27) TS-2168
(28) TS-2169

(29) TS-2170
(30) TS-2209
(31) TS-2218
(32) TS-2251
(33) TS-2253
(34) TS-2255
(35) TS-2264
(36) TS-2265
(37) TS-2275
(38) TS-2276
(39) TS-2277
(40) TS-2279
(41) TS-2280
(42) TS-2612

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.3 Record Keeping Requirements

Pursuant to 40 CFR 60.116b and 326 IAC 8-9-6, the Permittee shall keep readily accessible records of each storage tank required by D.7.1 and D.7.2 for the life of the storage tanks.

Facility Description [326 IAC 2-7-5(15)]: Specifically Regulated Insignificant Activities

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Specifically regulated insignificant activities with emissions below significant thresholds:

(r) One (1) natural gas fired boiler, Model, identified as boiler no. B-3, constructed in 1974, rated at 5.7 MMBtu per hour, exhausting at one (1) stack, identified as GB-3403.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Particulate Matter Limitation (PM_{10}) [326 IAC 6-1-10.1] [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-1-10.1(20) (Lake County PM_{10} emission requirements) PM_{10} emissions from the Cleaver Brooks boiler B-3 (Stack GB-3403) shall be limited to seven-thousandths (0.007) pounds per million Btu, and 0.07 pounds per hour.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

PART 70 OPERATING PERMIT CERTIFICATION

Source Name:	Dover Chemical –Hammond Works
Source Address:	3000 Sheffield Avenue, Hammond, IN 46327
Mailing Address:	3000 Sheffield Avenue, Hammond, IN 46327
Part 70 Permit No.:	T089-7797-00227

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify)

9 Report (specify)

9 Notification (specify)

9 Affidavit (specify)

9 Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

and

HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name:	Dover Chemical- Hammond Works
Source Address:	3000 Sheffield Avenue, Hammond, IN 46327
Mailing Address:	3000 Sheffield Avenue, Hammond, IN 46327
Part 70 Permit No.:	T089-7797-00227

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and

C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Dover Chemical – Hammond Works
Source Address: 3000 Sheffield Avenue, Hammond, IN 46327
Mailing Address: 3000 Sheffield Avenue, Hammond, IN 46327
Part 70 Permit No.: T089-7797-00227
Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	Dover Chemical – Hammond Works
Source Location:	3000 Sheffield Avenue, Hammond, IN 46320
County:	Lake
SIC Code:	2899
Operation Permit No.:	T 089-7797-00227
Permit Reviewer:	Dr. T. P. Sinha

On April 7, 2003, the Office of Air Quality (OAQ) had a notice published in the The Post Tribune, 1433 E 83rd Avenue, Merrillville, Indiana 46410, stating that Keil Chemical (Now Dover Chemical) had applied for a Part 70 Operating Permit to operate a specialty chemical manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 28, 2003, the Office of Air Quality (OAQ) had a second notice published in The Post Tribune, 1433 E 83rd Avenue, Merrillville, Indiana 46410, stating that after the original notice, the United States Environmental Protection Agency (U.S. EPA) has promulgated a new National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart NNNNN (National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production) on April 17, 2003 that applies to the above-mentioned company. Since the NESHAP is an applicable air pollution control requirement, the NESHAP requirements were included in the Title V operation permit. The notice provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on NESHAP part of the permit only.

Written comments were received on the proposed Part 70 permit from the public and the company. The summary of the comments and corresponding responses is as follows:

Note: The bolded language has been added and the language with a line through it has been deleted.

Comment 1: Pamela A. Henry:

It brings me great despair that a chemical plant so closely located within our community would want to damage our air quality even more than it is already. As a resident of North Hammond, I have read of all the wrong that Dover Chemical has done to our neighborhood and surrounding neighborhoods. Please reconsider this Permit 70 and deny any more pollutants in our area.

Response 1: This permit is the initial Part 70 permit required by state and federal law. The permit incorporates all of the state and federal air pollution control requirements into a single document. The permit does not allow any new processes or more air pollution from Dover Chemical. Emissions from this plant have dramatically decreased as the result of enforcement and permitting actions by the U.S. EPA and IDEM. The risk associated with these emissions has been further reduced since the production of Pyro-Chek has been discontinued at this site. The permit also incorporates a recent federal National Emissions Standard for Hazardous Air Pollutants (NESHAP) regulating production of hydrochloric acid (40 CFR 63, Subpart NNNNN). This rule requires the operation of a caustic scrubber to

reduce emissions by 99%. The rule also requires the preparation and implementation of a start up, shut down, malfunction plan to minimize emissions during those operational conditions. Dover Chemical already operates the scrubber. The permit requires that Dover Chemical comply fully with the NESHAP by the April 17, 2006 date established by the rule.

Comment 2: Virginia S. Mroz:

This is a comment on the preliminary findings regarding the applicability of a National Emissions Standard for Hazardous Air Pollutants (NESHAP) for a Part 70 permit. Dover Chemical deals with Chlorinated waxes-Sub. Part I. There are certain compounds in it that when they are emitted into the air can effect children and adults in a harmful way. These compounds are extremely dangerous.

On Calumet Avenue, a few blocks north of Dover Chemical, the city built a golf course for the citizens of Hammond including high school children at a cost of 33 million dollars. It is almost finished and will be fully used next summer. Compounds from chlorinated waxes will harm these innocent children and fun-seeking adults.

Response 2: Dover Chemical does use chlorinated paraffins (waxes). However, the hazardous air pollutants regulated by 40 CFR 63, subpart I –carbon tetrachloride, methylene chloride, tetrachloroethylene, chloroform and ethylene dichloride – are not used at Dover plant at Hammond.

On May 21, 2003, Dover Chemical submitted comments on the proposed Title V operation permit. The summary of the comments and corresponding responses is as follows:

Comment 1: Draft Permit Condition D.1 (a). The rated capacity for Boiler B-5 should be modified from 20 MMBtu/hour to 20.92 MMBtu/hour to accurately reflect the actual capacity of this boiler.

Response 1: The permit has been changed accordingly.

D.1 (a) and A2 (a)(2)
(2) One (1) Cleaver brooks natural gas fired boiler, Model CB-200-500, identified as B-5, constructed in 1980, rated at ~~20~~ **20.92** MMBtu per hour, and exhausting at one (1) stack, identified as GB-3402.

Comment 2: Sections A.2, D.2, D.3, D.4 and D.5 Tanks Capacity. These sections of the permit provide specific volumes for a number of process and storage tanks. In reviewing the detailed determinations of the volumes of a number of the tanks, we have identified a number of minor changes to the volumes included in the proposed permit. The following table identifies the specific A and D sections of the permit for the specified Tank numbers where we have identified minor changes to the listed tank volumes. The table lists the specific changes we are requesting to the tank volumes.

A (c)(3)	D.2 (c)(3)	TS-1019	28,000	27,950
A(c)(3)	D.2 (c)(3)	TS-1023	28,000	27,950
A (e)(4)	D.3 (e)(4)	TS-1029	16,000	15,880
A(j)	D.5(j)	TS-1027	12,000	14,930

A(l)	D.5 (l)	TS-1026	28,800	28,760
A(l)	D.5 (l)	TS-2318	10,000	10,570
A(n)	D.5 (n)	TS-1030	10,150	11,240
A(n)	D.5 (n)	TS-1031	14,900	15,220
A(n)	D.5 (n)	TS-1032	10,150	11,740

Response 2: The permit has been changed accordingly.

Comment 3:

(a) Sections A.2 (e)(2) and D.3 (e)(2). These sections provide a portion of the description of the Sulfurization System. At the end of the description found in section D.3 (e)(2), it indicates that the scrubbers exhaust to stack TP-2163. This same language should also be included at the end of the description found in Section A.2 (e)(2).

(b) Sections A.2 (e)(3) and D.3 (e)(3). These sections provide a description of a portion of the Sulfurization process, which includes the knock out tank and caustic slop tank. The caustic slop tank is not operated as a scrubber system per say, but caustic is added to the tank to reduce emissions from the knockout tank. As such we would request that a minor change be made to this section to read as follows:

"One (1) knockout storage tank, identified as TP-2164, constructed in 1976, with a maximum capacity of 1,500 gallons, ~~controlled by~~ exhausted to a caustic slop tank ~~scrubber~~, identified as TP-2167, constructed in 1995, and exhausting at Stack TP-2167."

(c) Sections A.2 (f) and D.4 (f). These sections provide a description of the reactors associated with the Hi-Temp process. We would suggest two minor changes be made to the descriptions. First, the word "and" at the beginning of paragraph number (5) should be eliminated or moved to the end of paragraph (4). Second, the last sentence of the last paragraph in this section should be amended to read as follow: "Alternately, the reactors identified in …".

(d) Sections A.2 (h)(4) and D.4 ((h)(4). This section contains a description of the filtration system for the Hi-Temp process. We would request that subparagraph (4) be amended to remove the first "and" in the sentence to read as follows: "One (1) filter, identified as…"

(e) Sections A.2 (o) and D.6 (o). The end of the paragraph found in Section D.6 (o) identifies the stacks emission points for this process. The same stack designations should be added to the end of Section A.2 (o).

(f) Sections A.3 (q) and D.7 (q). These sections provide descriptions of the storage tanks located at the facility. Paragraphs (q)(1) through (q)(27) include an indication that these tanks are vented to a scrubber. This is not the case, and these descriptions should be revised to eliminate the phrase *",* and vented to a scrubber", or ", and vented to a scrubber for odor control".

Response 3: The permit has been changed accordingly and changes are shown as below:

(a) It is the same language in the draft permit. No changes are needed.

(b) "One (1) knockout storage tank, identified as TP-2164, constructed in 1976, with a maximum capacity of 1,500 gallons, ~~controlled by~~ **exhausted to** a caustic slop tank ~~scrubber~~, identified as TP-2167, constructed in 1995, and exhausting at Stack TP-2167."

(c) The draft permit was corrected before the beginning of the formal comment period.

(d) The draft permit was corrected before the beginning of the formal comment period.

(e) The draft permit was corrected before the beginning of the formal comment period.

(f)

(1) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1001, constructed in 1997~~, and vented to a scrubber~~.

(2) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1002, constructed in 1997~~, and vented to a scrubber~~.

(3) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1003, constructed in 1993~~, and vented to a scrubber~~.

(4) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1004, constructed in 1978~~, and vented to a scrubber~~.

(5) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1005, constructed in 1978~~, and vented to a scrubber~~.

(6) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1006, constructed in 1978, ~~and vented to a scrubber~~.

(7) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1007, constructed in 1978~~, and vented to a scrubber~~.

(8) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1008, constructed in 1978~~, and vented to a scrubber~~.

(9) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1009, constructed in 1978~~, and vented to a scrubber~~.

(10) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1010, constructed in 1978~~, and vented to a scrubber~~.

(11) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1011, constructed in 1978~~, and vented to a scrubber~~.

(12) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1012, constructed in 1978, and vented to a scrubber.

(13) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1013, constructed in 1978~~, and vented to a scrubber~~.

(14) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1014, constructed in 1978~~, and vented to a scrubber~~.

(15) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1015, constructed in 1987~~, and vented to scrubber for odor control~~.

(16) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1016, constructed in 1978~~, and vented to a scrubber~~.

(17) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1017, constructed in 1978~~, and vented to a scrubber~~.

(18) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1018, constructed in 1978~~, and vented to a scrubber~~.

(19) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1019, constructed in 1996~~, and vented to a scrubber~~.

(20) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1020, constructed in 1997~~, and vented to a scrubber~~.

(21) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1021, constructed in 1997~~, and vented to a scrubber~~.

(22) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1022, constructed in 1996~~, and vented to a scrubber~~.

(23) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1023, constructed in 1996~~, and vented to a scrubber~~.

(24) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1024, constructed in 1997~~, and vented to a scrubber~~.

(25) One (1) storage tank, maximum capacity of 28,760 gallons, identified as TS-1026, constructed in 1980, and vented to a scrubber.

(26) One (1) storage tank, maximum capacity of 14,930 gallons, identified as TS-1027, constructed in 1989~~, and vented to a scrubber~~.

(27) One (1) storage tank, maximum capacity of 11,075 gallons, identified as TS-1028, constructed in 1980~~, and vented to a scrubber~~.

(44) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2168, constructed before 1976~~, and vented to a scrubber~~.

(45) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2169, constructed before 1976~~ and vented to a scrubber~~.

(46) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2170, constructed before 1976 ~~and vented to a scrubber~~.

Comment 4: Condition D.7.2, Volatile Organic Liquid Storage Vessels. This condition requires the maintenance of record for certain VOL storage tanks subject to 326 IAC 8-9. We believe that the listing of tanks should include four additional VOL storage tanks, which are listed under Section (d) for the Chlorination process, including tanks TS-2041, TS-2043, TS-2044 and TS-2012. These tanks were all constructed before July 23, 1984, and therefore are not subject to 40 CFR 60 Subpart Kb. However the tanks are VOL storage tanks that would be required to maintain the same records as those tanks listed in Condition D.7.2.

Response 4: A new condition has been added to comply with 326 IAC 8-9.

D.2.2 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]

Pursuant to 326 IAC 8-9, the Permittee shall maintain a record and submit to Compliance Branch, OAQ, IDEM a report containing the following information:

(a) The vessel identification number

(b) The vessels dimension

(c) The vessel capacity

for each of the following vessels.

(1) TS-2012
(2) TS-2041
(3) TS-2043
(4) TS-2044

Comment 5: A formal letter was received addressing the change in company ownership to Dover Chemical – Hammond Works and "responsible party" to David L. Rankin, Vice President, Environmental Affairs.

Response 5: The permit has been changed accordingly.

Source Name: ~~Keil Chemical Division, Ferro Corporation~~ **Dover Chemical – Hammond Works**

Responsible Official: ~~Plant Manager~~ **David L. Rankin, Vice President, Environmental Affairs**

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. The following updates have been made to the table of contents in order to be complete, clear, and correct.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]**[326 IAC 2-7-1(22)]**

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] **[326 IAC 2-7-5(15)]**

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)][326 IAC 2-7-6(1) and (6)] **[326 IAC 1-6-3]**

B.19 Permit Revision under Economic Incentives and Other Programs **[326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**
B.23 Transfer of Ownership or Operation**al Control** [326 IAC 2-7-11]

C.1 Particulate ~~Matter~~ Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour **[40 CFR 52 Subpart P]**[326 IAC 6-3-2]
C.12 Monitoring Methods **[326 IAC 3][40 CFR 60][40 CFR 63]**
C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] **[326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**
C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports
C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] **[326 IAC 2-7-6]**
C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] **[326 IAC 2-6]**
C.22 Application Requirements for Section 112(j) of the Clean Air Act **[40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]**

2. The duty to supplement an application is not an ongoing requirement after the permit is issued; therefore, (a) has been removed from B.7 Duty to Supplement and Provide Information.

B.7 Duty to ~~Supplement and~~ Provide Information ~~[326 IAC 2-7-4(b)]~~ [326 IAC 2-7-5(6)(E)] ~~[326 IAC 2-7-6(6)]~~

~~(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:~~

~~Indiana Department of Environmental Management~~
~~Permits Branch, Office of Air Quality~~
~~100 North Senate Avenue, P. O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~
~~and~~

~~Hammond Department of Environmental Management~~
~~5925 Calumet Avenue, Room – 304~~
~~Hammond, Indiana 46327~~

~~The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(b)~~**(a)** The Permittee shall furnish to IDEM, OAQ, and HDEM within a reasonable time, any information that IDEM, OAQ, and HDEM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and HDEM copies of records required to be kept by this permit.

~~(c)~~ **(b)** For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

3. OAQ has decided to move the provision that is required by 326 IAC 2-7-5(6) from B.8 to the front of the permit.

~~B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]~~

~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:~~

~~(1) Enforcement action;~~

~~(2) Permit termination, revocation and reissuance, or modification; or~~

~~(3) Denial of a permit renewal application.~~

~~(b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable constitutes a violation of the Clean Air Act.~~

~~(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.~~

~~(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.~~

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an

enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

4. B.11 (b) was revised to clarify that required record keeping needs to be implemented as well as the rest of the plan to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit. Also, (c) has been revised to clarify that OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The requirements to keep records of preventive maintenance in (d) has been moved to D Section. Because the general record keeping requirements (i. e retained for 5 years) are in Section C, it is not necessary to include them in this condition or in the D condition. At some sources, an OMM Plan is required. Instead of having two separate plans, the OMM Plan may satisfy the PMP requirements, so (d) has been added to this condition.

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall

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(b) The Permittee shall implement the PMPs, **including any required record keeping,** as necessary to ensure that failure to implement a PMP does not cause or contribute to ~~a violation~~ **an exceedance** of any limitation on emissions or potential to emit.

(c) A ----------lack of proper maintenance causes or ~~contributes to any violation~~ **is the primary contributor to an exceedance of any limitation on emissions or potential to emit**. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

~~(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.~~

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

5. In order to clarify that an amendment or modification will not be required for the addition, operation or removal of a nonroad engine, an explanation (instructions) and (d) has been added to B.18 Permit Amendment or Modification.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of

(b) ----------
(c) The Permittee may implement -
(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

6. For clarity, additional rule cites have been added to B.22 Inspection and Entry.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]**[IC 13-30-3-1]**

Upon presentation of ----------

(b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have** ~~Have~~ access to and copy any records that must be kept under the conditions of this permit;

(c) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect** ~~Inspect~~ any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample** ~~Sample~~ or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1,utilize** ~~Utilize~~ any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

7. The following change has been made to C.1 Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour:

C.1 Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour **[40 CFR 52 Subpart P]** [326 IAC 6-3-2~~(c)~~]

~~Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions ~~rate~~ from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions ~~rate~~ from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

8. The following revision has been made.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), **and** 326 IAC 1-7-4(~~d~~ **a**), (~~e~~ **b**), and (~~f~~ **d**) ~~and 326 IAC 1-7-5(d)~~ are not federally enforceable.

9. C.8 Asbestos Abatement Projects has been revised to clarify that the requirement to have an Indiana Accredited Asbestos inspector is not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification ----------

(b) The Permittee -------

(c) The Permittee ----------

(d) The notice ----------

(e) Procedures----------

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

~~(f)~~**(g)** Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. ~~The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.~~ **The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.**

10. C.15 Risk Management Plan has been revised so that it is more straightforward, and the condition requires the source to comply with the applicable requirements of 40 CFR 68 if a regulated substance is present at a source in more than a threshold quantity.

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68~~.215~~]

If a regulated substance, ~~subject to~~ **as defined in** 40 CFR 68~~,~~ is present at a source in more than a threshold quantity, ~~40 CFR 68 is an applicable requirement and the Permittee shall submit:~~ **the Permittee must comply with the applicable requirements of 40 CFR 68.**

~~(a) A compliance schedule for meeting the requirements of 40 CFR 68; or~~

~~(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).~~

(a) A Risk Management Plan was prepared as required by 40 CFR 68 and submitted to U.S. EPA. U.S. EPA received the RMP on June 21, 1999.

~~All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

11. The compliance response plan has been revised.

Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-7-5] [326 IAC 2-7-6] has been revised.

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions.** A CRP shall be submitted to IDEM, OAQ and HDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan** and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan to include such response steps taken**.

The OMM Plan or Parametric Monitoring and SMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan**; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan or **Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan** is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit ~~of~~ **or** control device be shut down, and it will be **ten (**10**)** days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. **The notification shall also include** the status of the applicable compliance monitoring parameter with respect to normal, and the results of the **response** actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall ~~constitute a violation of~~ **be considered a deviation from** the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall

prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

12. In order to clarify which documents need to be certified by the responsible official, the following update has been made:

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results ----------

(c) IDEM, OAQ reserves --------

The **response action** documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

13. C.18 (a) Emission Statement has been updated to include the specific rule cite that defines the regulated pollutants being referred to in this condition.

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee -------
(1) Indicate ---------
(2) Indicate estimated actual emissions of ~~other~~ regulated pollutants ~~(~~as defined by 326 IAC 2-7-1**(32))** **("Regulated pollutant which is used only for purposes of Section 19 of this rule")** from the source, for purposes of Part 70 fee assessment.

14. It is acceptable for records to be electronically accessible instead of being physically present at a source; therefore, the following update has been made:

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required **monitoring** data, reports and support information **required by this permit** shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be ~~kept~~ **physically present or electronically accessible** at the source location ----

15. "Permittee" in C.20 (a) has replaced the "source".

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The ~~source~~ **Permittee** shall submit

16. "Maximum Achievable Control Technology" has been added for clarifying the meaning of MACT.

C.22 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 2 **Maximum Achievable Control Technology** (MACT) Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

17. Condition no. D.1.2 has been deleted, as the boilers do not have capacity to burn fuel oil.

~~D.1.2 Opacity Limitations: Temporary Alternative Opacity Limitations [326 IAC 5-1-3]~~

~~(a) During startup and shutdown, the boiler nos. B-4, B-5, and B-6 may exceed the opacity limit in 326 IAC 5-1-2. However, opacity shall not exceed 60% for any six minute averaging period and shall not continue for more than two six minute periods in any 24 hour period.~~

18. The actual emissions of PM and PM10 are 1 ton per year whereas TSD shows 0.0 tons per year.

Pollutant	Actual Emissions (tons/year)
PM	~~0.0~~ **1.0**
PM-10	~~0.0~~ **1.0**
SO_2	0.0
VOC	<25
CO	<100
NO_x	<100
HAP (Cl_2 and HCl)	<25

19. National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production (40 CFR 63, Part NNNNN) became effective after Public Notice of this permit. Therefore, the source has to comply with this rule and it is being republic noticed.

The hydrochloric acid production facilities are subject to the National Emission Standards for Hazardous Air Pollutants for Hydrochloric Acid Production, 40 CFR 63, Subpart NNNNN. A copy of the signed version of the MACT is available on the U.S. EPA website, http://www.epa.gov/ttn/oarpg/t3pfpr.html.

The provisions of 40 CFR 63 Subpart A - General Provisions dated July 1 1998 edition, which are incorporated as 326 IAC 20-1-1, apply to the affected source described in this section except when otherwise specified in 40 CFR 63 Subpart NNNNN.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification nine months prior to the compliance date for the MACT that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance.

The following conditions have been added.

D.2.3 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

(a) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the hydrochloric acid production, as an affected source, as designated by 40 CFR 63.8985, except when otherwise specified in 40 CFR 63 Subpart NNNNN. The Permittee must comply with these requirements on and after April 17, 2003.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.2.4 National Emissions Standards for Hazardous Air Pollutants for Hydrochloric Acid Manufacturing [40 CFR Part 63, Subpart NNNNN]

(a) The affected source, the hydrochloric production facility is the collection of unit operations and equipment associated with production of liquid hydrochloric acid (HCl) product at a concentration of 30 weight percent or greater during its normal operations, is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hydrochloric Acid Manufacturing [40 CFR Part 63, Subpart NNNNN]. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart NNNNN no later than 3 years after April 17, 2003, or accept to and meet an enforceable HAP emissions limit below the major source threshold prior to three years after April 17, 2003. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(b) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart NNNNN:

(1) CS 2060 Hydrochloric Acid Tower
(2) TP-2060 Acid Tower Feed Water Tank
(3) TP-2033 Hydrochloric Acid Tower Product Tank
(4) TP-2061, 2062, 2065 & 2066 Scrubbers (TP 2065 and TP 2066 are back up scrubbers).
(5) TP-1030 Tank Farm Acid Loading Scrubber
(6) TS 1090, 1091, 1093 Muriatic Acid Storage Tanks (three storage tanks)
(7) The hydrochloric acid vent line going from the tank wagon over to the Tank Farm Scrubber TP-1030

(c) The definitions of 40 CFR 63, Subpart NNNNN at 40 CFR 63.9075 are incorporated by reference. Have we incorporated?

Record Keeping and Reporting Section:

D.2.5 National Emissions Standards for Hazardous Air Pollutants for Hydrochloric Acid Manufacturing - Notification Requirements [40 CFR 63, Subpart NNNNN]

Pursuant to 40 CFR 63.9045,

(a) the Permittee shall submit all of the notifications in Sec. Sec. 63.7(b) and (c), 63.8(f)(4) and (6), and 63.9 (b) through (h) that apply to this source by the dates specified;

(b) As specified in Sec. 63.9(b)(2), the Permittee shall submit an Initial Notification not later than 120 calendar days after April 17, 2003;

(c) the Permittee shall submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, as required in Sec. 63.7(b)(1);

(d) If a performance test is required as specified in Table 3 to this subpart, the Permittee shall submit a Notification of Compliance Status according to Sec. 63.9(h)(2)(ii);

(e) the Permittee shall submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th calendar day following the completion of the performance test according to Sec. 63.10(d)(2); and

(f) the Notification of Compliance Status shall also include the information in paragraph (f)(1) through (2) of this section

(1) each operating parameter value averaged over the full period of the performance test (for example, average pH).

(2) each operating parameter range within which HAP emissions are reduced to the level corresponding to meeting the applicable emission limits in Table 1 to this subpart.

(g) The notifications required by paragraphs (a) through (b) shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard

Chicago, Illinois 60604-3590

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

The notifications require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.2.6 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart NNNNN, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven months after April 17, 2003.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room – 304
Hammond, Indiana 46327

Indiana Department of Environmental Management
Office of Air Quality
and Hammond Department of Environmental Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Keil Chemical Division, Ferro Corporation
Source Location:	3000 Sheffield Avenue, Hammond, Indiana 46327
County:	Lake
SIC Code:	2899
Operation Permit No.:	T 089-7797-00227
Permit Reviewer:	Dr. Trip Sinha

The Office of Air Quality (OAQ) has reviewed a Part 70-permit application from Keil Chemical Division, Ferro Corporation relating to the operation of a chlorination process, a sulfurization process, hi-temp process, fuel additives process, and a miscellaneous process. There are three boilers, and a wastewater treatment air stripper to support the above facilities. Seven caustic scrubbers and a tank farm scrubber control the chlorination process. The sulfurization process is controlled by a tower scrubber system and a slop tank scrubber. Two caustic scrubbers, an alternate scrubber, and two carbon drums control the hi-temp process. A carbon adsorption drum, an amine scrubber, and a vent condenser control the fuel additives process. Two wet scrubbers and a demister control the miscellaneous process. All control equipment is voluntary.

The Pyro-Check process has been dismantled and is no longer in operation. The Pyro-Check part of the company was sold to another company who dismantled the process. Before, it was put out of operation; it was operating under Agreed Order Cause No. A-2250.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following emission units and pollution control devices:

SECTION D.1

(a) Group of Boilers

(1) One (1) Cleaver brooks natural gas fired boiler, Model CB-300HP, identified as B-4, constructed in 1974, rated at 12.55 MMBtu per hour, and exhausting at one (1) stack, identified as GB-3401.

(2) One (1) Cleaver brooks natural gas fired boiler, Model CB-200-500, identified as B-5, constructed in 1980, rated at 20 MMBtu per hour, and exhausting at one (1) stack, identified as GB-3402.

(3) One (1) Superior–Mohawk natural gas fired boiler, identified as B-6, constructed in 1988, rated at 20 MMBtu per hour, and exhausting at one (1) stack, identified as GB-3403. identified as B-4.

SECTION D.2 Chlorination system

with a maximum rated capacity of 5,000 pounds per hour of chlorinated metal working products, 10,000 pounds per hour of chlorinated polybutene, an intermediate product, and 8,300 pounds per hour of muriatic acid consisting of the following equipment:

(b) The system consisting of

(1) Nine (9) reactors, identified as TR-2001 (constructed before 1976), 2003 (constructed before 1976), 2004 (constructed before 1976), 2005 (constructed before 1976), 2006 (constructed before 1976), 2007 (constructed in 1977), 2008 (constructed in 1977) 2010 (constructed in 1983), and 2014 (constructed in 1990), and with a maximum capacity of 2,000 gallons each;

(2) Five (5) reactors, identified as TR-2002 (constructed in 1988), 2009 (constructed in 1982), 2015 (constructed in 1990), 2016 (constructed in 1990), and 2017 (constructed in 1993), and with a maximum capacity of 4,000 gallons each;

(3) One (1) sulfur monochloride tank, identified as TS-1058, constructed in 1981, and with a maximum capacity of 5,470 gallons;

(4) One (1) acid tower condensate neutralization tank, identified as TP-2030, constructed before 1976, and with a maximum capacity of 500 gallons;

(5) Two (2) chlorine railcar track spots, identified as RC-0101 and RC-0201, constructed before 1976, and with a maximum capacity of 1 railcar (containing at most 180,600 pounds) each;

(6) One (1) acid tower, identified as CB-2060, constructed before 1976, and with a maximum capacity of 8,300-lb/hr muriatic acid;

(7) One (1) tower product acid tank, identified as TP-2033, constructed before 1976, and with a maximum capacity of 560-gallons;

(8) One (1) tower water feed tank, identified as TP-2060 (constructed in 1996), and with a maximum capacity of 560-gallons; and

(9) Two (2) Chlorine vaporizers, identified as XV-2050 and XV-2051, constructed before 1976, and with a maximum capacity of 7,000 lb/hr Chlorine;

all controlled by seven (7) scrubbers identified as TP-2061 (constructed before 1976), TP-2062 (constructed before 1976), TP-2063 (constructed before 1976), TP-2064 (constructed before 1976), TP-2065 (constructed in 1977), TP-2066 (constructed in 1977), and TP-2067 (constructed in 1995), and exhausting at seven (7) stacks, identified as Stacks TP-2061 to 2067.

(c) The system consisting of

(1) Three (3) muriatic acid tanks, identified as TS-1090 (constructed in 1979), TS-1091 (constructed in 1980), and TS-1093 (constructed in 2000), and with a maximum capacity of 14,900, 16,000, and 16,000 gallons, respectively;

(2) Two (2) hypochlorite reduction tanks, identified as TP-3494, and TP-3495 (constructed in 1993), and with a maximum capacity of 6,250 gallons each;

(3) Two (2) chlorinated polybutene storage tanks, identified as TS-1019, and TS-1023 (constructed in 1997), and with a maximum capacity of 28,000 gallons each; and

(4) One (1) muriatic acid tank truck loading station, constructed in 1979, and with a maximum capacity of 1 truck;

controlled by one (1) caustic scrubber identified as TP-1030 constructed in 1980 exhausting at one (1) stack, identified as Stack TP-1030.

(d) The system consisting of

(1) One (1) chlorinated product tank, identified as TS-2041, constructed before 1976, with a maximum capacity of 4,000 gallons;

(2) Two (2) chlorinated product tanks, identified as TS-2043, and TS-2044, constructed before 1976, and with a maximum capacity of 4,100 gallons each; and

(3) One (1) chlorinated product-drumming tank, identified as TS-2012, constructed in 1978, and with a maximum capacity of 1,500 gallons.

SECTION D.3 Sulfurization system

with a maximum rated capacity of 6,000 pounds per hour of sulfurized products consisting of the following equipment:

(e) The system consisting of

(1) Three (3) Sulfurization reactors, identified as TR-2120, 2121, and 2123, constructed before 1976, with maximum capacity of 3,700, 3,700, and 7,500 gallons, respectively, controlled by two (2) caustic scrubbers, identified as TP-2162 and TP-2163 and exhausting at Stack TP-2163.

(2) Five (5) blowing tanks, identified as TP-2150 (constructed in 1977), 2151 (constructed in 1977), 2152 (constructed in 1977), 2153 (constructed in 1977); and 2154 (constructed in 1997), with maximum capacity of 11,000, 9,650, 11,500, 4,000, and 7,600 gallons, respectively, venting to a blowing tank knockout tank identified as TP-2159; controlled by two (2) caustic scrubbers, identified as TP-2162 and TP-2163 and exhausting at Stack TP-2163.

(3) One (1) knockout storage tank, identified as TP-2164, constructed in 1976, with a maximum capacity of 1,500 gallons, controlled by a caustic slop tank scrubber, identified as TP-2167, constructed in 1995, and exhausting at Stack TP-2167.

(4) One (1) scrubber liquor storage tank, identified as TS-1029, constructed in 1979,

and with a maximum capacity of 16,000 gallons.

SECTION D.4 Hi-Temp System

with a maximum rated capacity of 4,200 pounds per hour of hi-temp products consisting of the following equipment:

(f) The system consisting of

(1) Two (2) reactors, identified as TR-2320 and TR-2630, constructed in 1989, and 1990, respectively, and with a maximum capacity of 4,000 gallons each;

(2) Two (2) recovered methanol tanks, identified as TS-2602 and TS-2603, constructed in 1989, and with maximum capacity of 2,500, and 4,000 gallons, respectively;

(3) One (1) sludge tank, identified as TP-2604, constructed in 1989, and with a maximum capacity of 750 gallons;

(4) One (1) scrubber liquor tank, identified as TS-2610, constructed in 2001, and with a maximum capacity of 10,000 gallons;

(5) and one (1) intermediate holding tank, identified as TP-2601, constructed in 1989, and with a maximum capacity of 4,550 gallons;

controlled by two (2) caustic scrubbers identified as TP-2624 and TP-2626, constructed in 1989; and one flare, identified as GG-2627, constructed in 1990, in series, and exhausting at one (1) stack, identified as Stack GG-2627. Alternately, the reactor in item (f.1) can be controlled by one (1) scrubber identified as TP-2636, constructed in 1990; and exhausting at one (1) stack identified as Stack TP-2636.

(g) One (1) scrubber liquor truck loading station, constructed in 1989 controlled by a carbon drum, identified as TF-2610 constructed in 2001.

(h) A filtration system consisting of

(1) One (1) pre-coat tank, identified as TP-2722, constructed in 1995, and with a maximum capacity of 1,300 gallons;

(2) One (1) filter feed tank, identified as TP-2720, constructed in 1995, and with a maximum capacity of 5,000 gallons;

(3) One (1) filtrate tank, identified as TP-2730, constructed in 1995, and with a maximum capacity of 5,000 gallons; and

(4) One (1) filter, and identified as GF-2741, constructed in 1995, and with a maximum capacity of 69 cubic feet of filter cake;

controlled by a carbon drum, identified as GF-2728, and exhausting at a stack, identified as Stack GF-2728.

SECTION D.5 Fuel Additive system

with a maximum rated capacity of 12,000 pounds per hour of fuel additives (prior to blending) consisting of the following equipment:

(i) The system consisting of

(1) Nine (9) reactors, identified as TR-2001 (constructed before 1976), 2003 (constructed before 1976), 2004 (constructed before 1976), 2005 (constructed before 1976), 2006 (constructed before 1976), 2007 (constructed in 1977), 2008 (constructed in 1977) 2010 (constructed in 1983), and 2014 (constructed in 1990), and with a maximum capacity of 2,000 gallons each;

(2) Five (5) reactors, identified as TR-2002 (constructed in 1988), 2009 (constructed in 1982), 2015 (constructed in 1990), 2016 (constructed in 1990), and 2017 (constructed in 1993), and with a maximum capacity of 4,000 gallons each;

(3) One (1) EDA recycle tank, identified as TS-2052 (constructed in 1985), and with a maximum capacity of 1,700 gallons;

controlled by a scrubber identified as TP-2072 (constructed in 1985), and exhausting at a stack identified as Stack TP-2072.

(j) One (1) virgin EDA tank, identified as TS-1027, (constructed in 1985), maximum capacity of 12,000 gallons, controlled by a carbon adsorption drum identified as GF-1029, and exhausting at stack identified as Stack GF-1029.

(k) Two (2) continuous wash systems and two (2) stripping columns identified as CD-2319 (constructed in 1985) and CD-2350 (constructed in 1990), controlled by two (2) vent condensers identified as XT-2313, and XT-2350, and exhausting at stacks identified as Stack XT-2313, and Stack XT-2350.

(l) Two (2) solvent storage tanks, identified asTS-1026 (constructed in 1985), and TS-2318 (constructed in 1990), and maximum capacity of 28,800, and 10,000 gallons, respectively.

(m) Four- (4) product rundown tanks, and identified as TS-1035, TS-1036 (both constructed in 1985), TP-2360, and TP-2361 (both constructed in 1990), and maximum capacity of 6,800 gallons each.

(n) Three (3) fuel additive blending tanks, identified as TS-1030, TS-1031, and TS-1032 (all constructed in 1985), and maximum capacity of 10,150, 14,900, and 10,150 gallons, respectively.

SECTION D.6 Miscellaneous system

With a maximum rated capacity of 3,000 pounds per hour consisting of the following equipment:

(o) Five reactors, identified as TR-2224 (constructed in 1980), 2225 (constructed before 1976), 2226 (constructed before 1976), 2227 (constructed before 1976), and 2228 (constructed before 1976), maximum capacity of 5,500, 2,000, 7,000, 400, and 7,500 gallons, respectively; controlled by two (2) wet scrubbers, identified as PE-2228, and TP-2332, and exhausting at stacks identified as Stack PE-2228, and Stack TP-2332.

(p) Two (2) reactors, identified as TR-2329 (constructed in 1986), and TR-2322 (constructed in

1984), maximum capacity of 1,500, and 2,000 gallons, respectively, controlled by a demister (constructed in 1989), identified as TP-2322 and exhausting at stack, identified as Stack TP-2322.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]

This stationary source also includes the following insignificant activities, which are specifically regulated, as defined in 326 IAC 2-7-1(21):

SECTION D.7 VOC STORAGE TANKS

(q) Storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC. [326 IAC 12, and 40 CFR 60.112b(a)]

(1) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1001, constructed in 1997, and vented to a scrubber.

(2) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1002, constructed in 1997, and vented to a scrubber.

(3) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1003, constructed in 1993, and vented to a scrubber.

(4) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1004, constructed in 1978, and vented to a scrubber.

(5) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1005, constructed in 1978, and vented to a scrubber.

(6) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1006, constructed in 1978, and vented to a scrubber.

(7) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1007, constructed in 1978, and vented to a scrubber.

(8) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1008, constructed in 1978, and vented to a scrubber.

(9) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1009, constructed in 1978, and vented to a scrubber.

(10) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1010, constructed in 1978, and vented to a scrubber.

(11) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1011, constructed in 1978, and vented to a scrubber.

(12) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1012, constructed in 1978, and vented to a scrubber.

(13) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1013, constructed in 1978, and vented to a scrubber.

(14) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1014, constructed in 1978, and vented to a scrubber.

(15) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1015, constructed in 1987, and vented to scrubber for odor control.

(16) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1016, constructed in 1978, and vented to a scrubber.

(17) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1017, constructed in 1978, and vented to a scrubber.

(18) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1018, constructed in 1978, and vented to a scrubber.

(19) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1019, constructed in 1996, and vented to a scrubber.

(20) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1020, constructed in 1997, and vented to a scrubber.

(21) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1021, constructed in 1997, and vented to a scrubber.

(22) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1022, constructed in 1996, and vented to a scrubber.

(23) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1023, constructed in 1996, and vented to a scrubber.

(24) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1024, constructed in 1997, and vented to a scrubber.

(25) One (1) storage tank, maximum capacity of 28,780 gallons, identified as TS-1026, constructed in 1980, and vented to a scrubber.

(26) One (1) storage tank, maximum capacity of 14,930 gallons, identified as TS-1027,

constructed in 1989, and vented to a scrubber.

(27) One (1) storage tank, maximum capacity of 11,075 gallons, identified as TS-1028, constructed in 1980, and vented to a scrubber.

(28) One (1) storage tank, maximum capacity of 15,880 gallons, identified as TS-1029, constructed in 1980.

(29) One (1) blend tank, maximum capacity of 11,740 gallons, identified as TS-1030, constructed in 1986.

(30) One (1) blend tank, maximum capacity of 15,220 gallons, identified as TS-1031, constructed in 1986.

(31) One (1) blend tank, maximum capacity of 11,740 gallons, identified as TS-1032, constructed in 1986.

(32) One (1) POBA storage tank, maximum capacity of 15,220 gallons, identified as TS-1033, constructed in 1986.

(33) One (1) storage tank, maximum capacity of 15,380 gallons, identified as TS-1039, constructed in 1987.

(34) One (1) storage tank, maximum capacity of 15,380 gallons, identified as TS-1040, constructed in 1987.

(35) One (1) blend tank, maximum capacity of 15,540 gallons, identified as TS-1042, constructed in 1989.

(36) One (1) storage or blend tank, maximum capacity of 14,900 gallons, identified as TS-1043, constructed in 1990.

(37) One (1) wax storage tank, maximum capacity of 20,390 gallons, identified as TS-1056, constructed in 1978.

(38) One (1) storage tank, maximum capacity of 20,390 gallons, identified as TS-1057, constructed in 1978.

(39) One (1) storage tank, maximum capacity of 4,010 gallons, identified as TS-1081, constructed in 1989.

(40) One (1) storage tank, maximum capacity of 15,220 gallons, identified as TS-1082, constructed in 1989.

(41) One (1) storage tank, maximum capacity of 1,320 gallons, identified as TS-1083, constructed in 1976.

(42) One (1) storage tank, maximum capacity of 10,360 gallons, identified as TS-2160, constructed before 1976.

(43) One (1) storage tank, maximum capacity of 10,360 gallons, identified as TS-2163, constructed before 1976.

(44) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2168, constructed before 1976, and vented to a scrubber.

(45) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2169, constructed before 1976 and vented to a scrubber.

(46) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2170, constructed before 1976 and vented to a scrubber.

(47) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2178, constructed in 1998.

(48) One (1) storage tank, maximum capacity of 2,600 gallons, identified as TS-2209, constructed before 1979.

(49) One (1) storage tank, maximum capacity of 10,800 gallons, identified as TS-2218, constructed before 1979.

(50) One (1) storage tank, maximum capacity of 10,690 gallons, identified as TS-2251, constructed before 1976.

(51) One (1) storage tank, maximum capacity of 6,760 gallons, identified as TS-2253, constructed before 1976.

(52) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2255, constructed before 1976.

(53) One (1) storage tank, maximum capacity of 10,360 gallons, identified as TS-2264, constructed before 1979.

(54) One (1) storage tank, maximum capacity of 31,070 gallons, identified as TS-2265, constructed before 1979.

(55) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2275, constructed before 1979.

(56) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2276, constructed before 1979.

(57) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2277, constructed before 1976.

(58) One (1) storage tank, maximum capacity of 3,450 gallons, identified as TS-2279, constructed before 1976.

(59) One (1) storage tank, maximum capacity of 3,450 gallons, identified as TS-2280, constructed before 1976.

(60) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2305, constructed in 1990.

(61) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2315, constructed in 1990.

(62) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2318, constructed in 1990.

(63) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2362, constructed in 1990.

(64) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2364, constructed in 1990.

(65) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2365, constructed in 1990.

(66) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2367, constructed in 1990.

(67) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2606, constructed in 1989.

(68) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2610, constructed in 1990.

(69) One (1) storage tank, maximum capacity of 4,760 gallons, identified as TS-2612, constructed in 1990.

(70) One (1) storage tank, maximum capacity of 30,080 gallons, identified as TS-2613, constructed in 1990.

(71) One (1) storage tank, maximum capacity of 16,920 gallons, identified as TS-2619, constructed in 1990.

SECTION D.8 5.7 MMBtu/hr Boiler

(r) One (1) natural gas fired boiler, Model, identified as boiler no. B-3, constructed in 1974, rated at 5.7 MMBtu per hour, exhausting at one (1) stack, identified as GB-3403.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) 6.6 MMBtu per hour hot oil heater, identified as B-3.

(2) One (1) 4 MMBtu per hour hot oil heater, identified as B-7.

(b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour except where total capacity of equipment operated by one stationary source exceeds 2,00,000 Btu per hour.

(c) Combustion source flame safety purging on startup

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, and having a storage capacity less than or equal to 10,500 gallons.

(e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(f) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.

(g) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(h) Filling drums, pails, or other packaging containers with lubricating oils, waxes, and greases,

(i) Machining where an aqueous cutting coolant continuously floods the machining interface.

(j) Cleaners and solvents characterized as follows:

(A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100^0F) or;

(B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 28 degrees C (68^0F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(k) Closed loop heating and cooling system.

(l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(m) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(n) Forced and induced draft cooling tower system not regulated under a NESHAP.

(o) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment

(p) Heat exchanger cleaning and repair

(q) Process vessel degassing and cleaning to prepare for internal repairs.

(r) Paved and unpaved roads and parking lots with public access.

(s) Asbestos abatement projects regulated by 326 IAC 14-10.

(t) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(u) Equipment used to collect any material that might be released during a malfunction, process upset, or spills cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(v) Blowdown for any of the following: sight glass; boiler; compressors, pumps, and cooling tower.

(w) Diesel generators not exceeding 1600 horsepower;

(x) Stationary fire pumps.

(y) Purge double bleed and block valves.

(z) Filter or coalescer media change out.

(aa) A laboratory as defined in 326 IAC 2-7-1(20)(C).

(bb) Activities or categories of activities with a combination of HAP emission not previously identified:

(1) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination HAPs:

(A) Wastewater Air Stripping Towers (xylenes, naphthalene, cumene, ethylbenzene, methanol, glycol ethers, ethylacrylate, toluene; end point of wastewater treatment).

(B) Tankwagon, railcar, and drum loading/unloading activities ((xylenes, naphthalene, cumene, ethylbenzene, methanol, glycol ethers, ethylacrylate, toluene; end point of wastewater treatment)

Existing Approvals

The source has been operating under local operation permits including, but not limited to, the following:

(a) Permit # 4274- Hot oil heater, ID no. B-3, issued on.

(b) Permit # 4305- Hot oil heater, ID no. B-7, issued on.

(b) Permit # 4275- Cleaver Brooks Boiler, ID no B-4, issued on.

(c) Permit # 4276- Cleaver Brooks Boiler, ID no B-5, issued on.

(d) Permit # 4304- Superior–Mohawk Boiler, ID no B-6, issued on.

(e) Permit # 4278- Chlorination process, issued on.

(f) Permit # 4277- Sulfurization process, issued on.

(g) Permit # 01197- Fuel additives, issued on may 14, 1998.

(h) Permit # 01229- Miscellaneous process, issued on October 28, 1998.

(i) Permit # 00098- Wastewater pretreatment air stripper, issued on February 20, 1996.

(j) Permit # 4283- HCl Truck loading

(k) Permit # 4300 – T-1027 Tank

(l) Permit # 01203 – Trailer Mounted Boiler

(m) Exemption # 16055 – Two Sulfurization system replacement scrubbers

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.
The Pyro-Check part of the plant was sold to another company. That company decommissioned the Pyro-Check process and removed part of the equipment. Keil Chemical may use some of the piping as spare parts somewhere in the process otherwise the remaining parts will be sold as scrap.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996. Additional information was received on August 13, 26, and December 30, 1999; February 2, and March 7, 2000; September 10, 2001; April 22, and December 11, 2002; and March 5, 10, and 20, 2003.

A notice of completeness letter was mailed to the source on February 10, 1997.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as Athe maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA@

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	<100
PM-10	<100
SO_2	<100
VOC	>25
CO	<100
NO_x	<100
H_2S	>10

Note: For the purpose of determining Title V applicability for particulate, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Cl_2	>10
HCl	>10
TOTAL	>25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

and

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.0
PM-10	0.0
SO_2	0.0

VOC	<25
CO	<100
NO_x	<100
HAP (Cl_2 and HCl)	<25

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM_{10}	Nonattainment
SO_2	Nonattainment
NO_2	Attainment
Ozone	Severe Nonattainment
CO	Maintenance
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as severe nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) Lake County has been classified as Severe nonattainment for PM_{10}. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(c) Lake County has been classified as attainment or unclassifiable for NO_2, CO, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(d) Local Agency
Based on the initial location of this source, the HDEM shall be contacted for additional air operating requirements. OAQ has the authority to issue this operation permit.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements, which assume that all reasonable information, is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

26 IAC 12 and 40 CFR Part 60, Subpart Dc (Standards of Performance for Industrial Commercial-Institutional Steam generating Units)

The boiler nos. B-3 is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40b, Subpart Dc), because this boiler has a heat input capacity from fuels combusted in the steam generating drum of less than 10 million Btu/hour.

The boiler nos. B-4, B-5, and B-6 are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40b, Subpart Dc), because each boiler has a heat input capacity from fuels combusted in the steam generating drum of greater than 10 million Btu/hour and was existing and in operation before June 9, 1989.

326 IAC 12 and 40 CFR Part 60.110b, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels)

The following VOC storage tanks are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels), because the construction on these tanks commenced after July 23, 1984 and each storage tank has a capacity equal to or greater than 40 cubic meters (m^3) but less than 75 m^3. These storage tanks are exempt from the General Provisions (part 60, subpart A). Pursuant to 40 CFR 60.116b (b), the owner or operator of each storage tank shall keep readily accessible record showing the dimension of the storage tank and analysis showing the capacity of the storage tank for the life of the tank.

(1)	TS-1001
(2)	TS-1002
(3)	TS-1003
(4)	TS-1019
(5)	TS-1020
(6)	TS-1021
(7)	TS-1022
(8)	TS-1023
(9)	TS-1024
(10)	TS-1027
(11)	TS-1030
(12)	TS-1031
(13)	TS-1033
(14)	TS-1039
(15)	TS-1040
(16)	TS-1042
(17)	TS-1043
(18)	TS-1082
(19)	TS-2178
(20)	TS-2305
(21)	TS-2315
(22)	TS-2318
(23)	TS-2362
(24)	TS-2364
(25)	TS-2365
(26)	TS-2367
(27)	TS-2606

(28) TS-2610
(29) TS-2613
(30) TS-2619

326 IAC 12 and 40 CFR Part 60, Subpart VV (Standards of Performance for Equipment Leaks of VOC in Synthetic Organic Chemical Manufacturing Industry (SOCMI))

The source does not produce specified organic chemicals as an intermediate or final product or byproduct. Therefore it is exempt from the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.480), Subpart VV - Standards of Performance for Equipment Leaks of VOC In Synthetic Organic Chemical Manufacturing Industry (SOCMI).

326 IAC 12 and 40 CFR Part 60, Subpart III (Standards of Performance for Volatile Organic Compounds (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI)) Air Oxidation Unit Processes)

The source does not produce specified organic chemicals as an intermediate or final product or byproduct. Therefore, it is exempt from the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.610, Subpart III - Standards of Performance for Volatile Organic Compounds (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes.

326 IAC 12 and 40 CFR Part 60, Subpart NNN (Standards of Performance for Volatile Organic Compounds (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations)

The source does not produce specified organic chemicals as an intermediate or final product or byproduct. Therefore it is exempt from the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.660, Subpart NNN - Standards of Performance for Volatile Organic Compounds (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI)) Distillation Operations.

326 IAC 12 and 40 CFR Part 60, Subpart RRR (Standards of Performance for Volatile Organic Compounds (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes)

The source does not produce specified organic chemicals as an intermediate or final product or byproduct. Therefore it is exempt from the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.700, Subpart RRR - Standards of Performance for Volatile Organic Compounds (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI)) Reactor Processes.

326 IAC 14 and 40 CFR 61 (National Emission Standards For Hazardous Air Pollutants)

The Standards for Hazardous Air Pollutants (NESHAPs) 326 IAC 14, (40 CFR 61) are not applicable to this source, because none of the pollutants covered by this rule is emitted from any of its processes.

326 IAC 20 and 40 CFR 63, Parts F and G (National Emission Standards for Hazardous Air Pollutants)

The Chlorination process

(a) does not produce as a primary product a SOCMI chemical listed in table 1 of subpart F; and

(b) does not use as a reactant or manufacture as a product one or more of the organic HAPs listed in table 2 of subpart F.

Therefore, Chlorination process is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 20, (40 CFR 63, Parts F and G).

326 IAC 20 and 40 CFR 63, Part H (National Emission Standards for Hazardous Air Pollutants)

The National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 20, and 40 CFR 63 Subpart H, standard for equipment leaks, is not applicable to this source, because no 40 CFR 63 Subparts currently apply to this source.

326 IAC 20 and 40 CFR 63, Part I (National Emission Standards for Hazardous Air Pollutants)

The National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 20, and 40 CFR 63 Subpart I, Standards for Negotiated Regulation for Equipment Leaks, is not applicable to this source, because none of the listed chlorinated paraffins are emitted from this source.

[40 CFR 63.52(b) and (e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12(a)] (Application Requirements for Section 112(j) of the Clean Air Act)

The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of hazardous air pollutant (HAP) emissions (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs)

(a) Submit a Part 2 MACT Application within twenty-four (24) months after the Permittee submitted a Part 1 MACT Application.

Note that on April 25, 2002, Earthjustice filed a lawsuit against the US EPA regarding the April 5, 2002 revisions to the rules implementing Section 112(j) of the Clean Air Act. In particular, Earthjustice challenged the US EPA's 24-month period between the Part 1 and Part 2 MACT Application due dates. The U.S. EPA and Earthjustice filed a settlement agreement on November 26, 2002. Proposed rule amendments based on this settlement agreement were published in the December 9, 2002 *Federal Register*. It appears that U.S. EPA intends to establish a phased schedule for promulgating all of the remaining MACT standards, resulting in four Part 2 MACT Application deadlines. Under the proposed amendments, some Part 2 MACT Applications would be due as early as May 15, 2003.

(b) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of the following will occur:

(1) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or

(2) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or

(3) The Permittee may submit an application for a significant permit modification under

326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.

40 CFR 64 and 326 IAC 2-7-5(3)(A)(ii) (Compliance Assurance Monitoring Rule)

On and after April 20, 1998, the CAM submittal shall be included with Part 70 permit application. The TV permit application was deemed complete before the above date. Therefore CAM submittal is not required for this permit. The applicant shall submit the CAM plan, if applicable, at the time of renewing the TV permit or when application for any significant permit modification is submitted.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on August 29, 1999. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 and 326 IAC 2-3 (PSD and Emissions Offset)

This source is a grand fathered major source for Emissions Offset and Prevention of Significant Deterioration (PSD) and Emissions Offset. In the past no major modification of the source was done.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1-2 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2(B) (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (20%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(c) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-1 (Nonattainment Area Particulate Limitations)

The source is located in Lake County and this source does not have the potential to emit 100 tons or more, or have actual emissions of ten tons or more of particulate matter per year. Therefore, this source is not subject to rule 326 IAC 6-1-1 and 2.

326 IAC 6-1-11.1 (Lake County Fugitive Particulate Control Requirements)

The source is located in Lake County and this source does not have the potential to emit of fugitive particulate emissions of 5 tons per year or more. Therefore, this source is not subject to rule 326 IAC 6-1-11.1.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions) the Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake County)

The source has the potential to emit volatile organic compounds (VOCs) at levels equal to or greater than twenty five tons per year (tpy) in Lake county and it belongs to source Category (H) Batch Processors. Therefore, the rule 326 IAC 8-7-2 does not apply to this source.

326 IAC 2-4.1(Major Sources of Hazardous Air Pollutants)

This rule does not apply to this source, because no emission unit was constructed or reconstructed after July 27, 1997.

State Rule Applicability - Individual Facilities

326 IAC 6-1-1 (Particulate Emission Limitations for Sources of Indirect Heating)

This boiler B-6 is not subject to 326 IAC 6-1-2(b)(3), because the source or the boiler does not have the potential to emit one hundred (100) tons or more and actual emissions of ten (10) tons or more of particulate matter per year.

Boiler no. B-6 was constructed after September 1983. Therefore, the boiler no. B-6 is subject to rule 326 IAC 6-2-4.

Pursuant to 326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d)) the particulate emissions from the combustion of natural gas from boiler B-6 (Stack GB-3403 shall be limited to 0.387 pounds per million Btu, and 7.44 pounds per hour.

The above limit is established by the following equation:

$$Pt = (1.09)/(Q^{0.26})$$

Where:

Pt	=	Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q	=	Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

326 IAC 6-1-10.1(Lake County PM_{10} Emission Requirements)

The source is located in Lake County where Particulate Rules for Nonattainment Area Limitations

rule 326 IAC 6-1-10.1 apply. The Boiler nos. B-3, B-4, B-5, Chlorination process, and Sulfurization process have source specific emission PM_{10} requirements as specified in following subsections.

(a) Pursuant to 326 IAC 6-1-10.1(20) (Lake County PM_{10} emission requirements) PM_{10} emissions from the Cleaver Brooks boiler B-3 (Stack GB-3401) shall be limited to seven-thousandths (0.007) pounds per million Btu, and 0.04 pounds per hour.

(b) Pursuant to 326 IAC 6-1-10.1(20) (Lake County PM_{10} emission requirements) PM_{10} emissions from the Cleaver Brooks boiler B-4 (Stack GB-3401) shall be limited to seven-thousandths (0.007) pounds per million Btu, and 0.09 pounds per hour.

(c) Pursuant to 326 IAC 6-1-10.1(20) (Lake County PM_{10} emission requirements) PM_{10} emissions from the Cleaver Brooks boiler B-5 (Stack GB-3402) shall be limited to seven-thousandths (0.007) pounds per million Btu, and 0.14 pounds per hour.

(d) Pursuant to 326 IAC 6-1-10.1(20) (Lake County PM_{10} emission requirements) PM_{10} emissions from Chlorination process shall be 0.001 pounds per ton of product and 0.003 pounds per hour.

(e) Pursuant to 326 IAC 6-1-10.1(20) (Lake County PM_{10} emission requirements) PM_{10} emissions from Sulfurization process shall be 0.17 pounds per ton of product and 0.23 pounds per hour.

Compliance determinations for boilers

Boiler No.	Fuel	Boiler Capacity MMBtu/hr	PM_{10} limit (lbs/MMBtu)	PM_{10} limit (lbs/hr)	PM_{10} PTE (tons/yr)	PM_{10} Actual Emissions (tons/yr)
B-3	Natural Gas	5.7	0.007	0.04	0.175	<25
B-4	Natural Gas	12.5	0.007	0.09	0.383	<25
B-5	Natural Gas	20	0.007	0.14	0.613	<25
B-6	Natural Gas	20	0.007	0.14	0.613	<25

All the boilers combust natural gas only. The particulate emission factors for natural gas is 7.6 lbs/10^6 scf, which equate to 0.007 lbs/MMBtu.

Therefore, all three boilers meet the particulate emission limit when combusting natural gas.

Testing, Preventive Maintenance Plan, and Compliance Monitoring

The testing, Preventive Maintenance Plan, and Compliance Monitoring conditions are not required for the boilers, because there are no controls required and the actual emissions of PM_{10} and sulfur dioxide are less than 25 tons per year from each boiler.

Compliance determination for Chlorination and Sulfurization processes

Transferring the reactant from bags to the reactors creates the PM_{10} emissions.

Chlorination Process:

PM_{10}EF = 0.001 lbs/ton, Maximum product rate containing dry powder stuff = 3 tons/hr

Potential to Emit Emissions from Chlorination process	=	EF * Process weight rate
	=	(0.001 lbs/ton of dry reactant)*(3 tons/hr)
	=	0.003 lbs/hr
	=	0.003 lbs/hr (Allowable)

Sulfurization Process:

PM_{10}EF = .157 lbs/ton, Process Weight Rate for dry powder stuff = .157 lbs/ton
Maximum product rate containing dry powder stuff = 1.46 tons/hr

Potential to Emit from Sulfurization process	=	EF * Process weight rate
	=	(.157 lbs/ton)*(1.46 tons/hr)
	=	0.23 lbs/hr
	=	0.23 lbs/hr (Allowable)

All dry reactants mix with liquid material and all the products are in liquid form. Only VOC emissions are created.

Therefore, Chlorination and Sulfurization processes are in compliance with rule 326 IAC 6-1-10.1(20).

There are no preventive maintenance plan, compliance monitoring or testing condition requirements for these processes, as there are no controls required on these processes and the allowable and actual emissions are less than 10 pounds and 25 tons per year, respectively.

326 IAC 5-1-3 (Opacity Limitations: Temporary Alternative Opacity Limitations)

(a) During startup and shutdown, the boiler nos. B-4, B-5, and B-6 may exceed the opacity limit in 326 IAC 5-1-2. However, opacity shall not exceed 60% for any six minute averaging period and shall not continue for more than two six minute periods in any 24 hour period.

326 IAC 6-3-2 (Particulate Emissions Limitation for Manufacturing Processes)

(a) The Hi-Temp and Miscellaneous processes are not subject to 326 IAC 6-1-2(a), because none of these processes have the potential to emit one hundred (100) tons or more and actual emissions of ten (10) tons or more of particulate matter per year.

Therefore, these processes are subject to 326 IAC 6-3-2.

Pursuant to 326 IAC 6-3(e)(3) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Hi-Temp and Miscellaneous reactors shall be limited as follows:

Process/Facility	Reactors	Process Weight Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Hi-Temp Process	TR-2620	0.187	1.33

	TR-2630	0.187	1.33
	Filtration	0.234	1.55
Miscellaneous Process	TR-2224	8.0	16.5
	TR-2225	2.909	8.38
	TR-2226	10.182	19.4
	TR-2227	0.582	2.85
	TR-2228	10.909	20.33
	TR-2329	2.182	6.92
	TR-2322	2.90	8.38

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where and E = rate of emission in pounds per hour;
P = process weight rate in tons per hour

Emission Calculation for Dumping Material from Bags

Transferring the reactant from bags to the reactors creates the PM10 emissions.

The most conservative estimate for PM10 emission factor was taken from AP-42, Section 13.4.2

Inputs

Dry material addition rate = 10,000 lbs/batch (25% higher than highest known batch

Minimum batch time = 2.75 hours (Minimum Batch Time for any product)

Hourly throughput of dry material = 1.82 tons/hr

k (factor) = 0.0032

Wind speed = 1 Mph (Based on the process occurring inside the building

Moisture = 0.1% (Very Low assumed Value)

PM or PM_{10} EF = $k[(U/5^{1.3})/(M/2^{1.4})]$ lb/ton

= $(0.0032)[(1/5^{1.3})/(0.1/2^{1.4})]$ lb/ton

0.1234/0.3789

= 0.0194 lb/ton

PM or PM_{10} emissions = (0.0194 lb/ton)*((5 tons/batch)/(2.75 hrs/batch))

= 0.035 lbs/hr

Therefore, Hi-Temp and Miscellaneous processes are in compliance with rule 326 IAC 6-3-2.

There are no compliance monitoring, preventive maintenance plan or testing condition requirements for these processes, because there are no controls on these processes and the actual emissions are much less than 25 tons per year.

(b) The fuel additive process does not use any particulate emitting reactants, therefore, the rule 326 IAC 6-3-2 does not apply to Fuel Additive process.

326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-4-1.1(b)(4), the boiler nos. B-3, B-4 and B-5 shall burn natural gas or distillate oil and sulfur dioxide emissions shall be limited to three-tenths (0.3) pounds per million Btu. The boilers now do not have the capability to burn fuel oil.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The rule 326 IAC 8-4-3 does not apply to this source, because the capacities of the petroleum storage tanks have less than 39,000 gallons.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The following VOC storage tanks are not subject to 40 CFR 60, Subpart Kb, New Source Performance Standard for Volatile Organic Liquid Storage; and have a capacity of less than 39,000 gallons each. Therefore pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall maintain a record and submit to Compliance Branch, OAQ, IDEM a report containing the following information

(a) The vessel identification number

(b) The vessels dimension

(c) The vessel capacity

for each of the following vessels:

(1) TS-1004
(2) TS-1005
(3) TS-1006
(4) TS-1007
(5) TS-1008
(6) TS-1009
(7) TS-1010
(8) TS-1011
(9) TS-1012
(10) TS-1013

(11) TS-1014
(12) TS-1015
(13) TS-1016
(14) TS-1017
(15) TS-1018
(16) TS-1026
(17) TS-1028
(18) TS-1029
(19) TS-1032
(20) TS-1039
(21) TS-1056
(22) TS-1057
(23) TS-1083
(24) TS-2160
(25) TS-2163?
(26) TS-2168?
(27) TS-2169?
(28) TS-2170
(29) TS-2209
(30) TS-2218
(31) TS-2251
(32) TS-2253
(33) TS-2255
(34) TS-2264
(35) TS-2265
(36) TS-2275
(37) TS-2276
(38) TS-2277
(39) TS-2279
(40) TS-2280
(41) TS-2612

Testing Requirements

There are no specific requirements of PSD and Offset rules to VOC, and H_2S emissions from the processes, because this is a grand fathered major source for PSD and Emission Offset. The control equipment for controlling VOC and H_2S emissions on the processes is voluntary.

The actual particulate emissions from the boiler nos. B-4, B-5, and B-6; and Chlorination, Sulfurization, Hi-Temp and Miscellaneous processes are each less than 25 tons per year. Therefore, testing is not required for the boilers, Chlorination, Sulfurization, Hi-Temp and Miscellaneous processes.

Compliance Requirements

Permit issued under 326 IAC 2-7 is required to ensure that source can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source=s failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are none.

Conclusion

The operation of this shall be subject to the conditions of the attached proposed Part 70 Permit No. T 089-7797-00227.

Indiana Department of Environmental Management
Office of Air Quality
and Hammond Department of Environmental Management

Technical Support Document (TSD) for NESHAP Section of Part 70 Operating Permit

Source Name:	Dover Chemical – Hammond Works (Formerly Keil Chemical Division, Ferro Corporation)
Source Location:	3000 Sheffield Avenue, Hammond, IN 46320
County:	Lake
SIC Code:	2899
Operation Permit No.:	T 089-7797-00227
Permit Reviewer:	Dr. T. P. Sinha

The proposed permit was public noticed from April 7, 2003 to May 6, 2003. During the Public Notice period, the United States EPA promulgated National Emission Standards for Hazardous Air Pollutants (NESHAP): Hydrochloric Acid Production, (40 CFR 63, Part NNNNN) on April 17, 2003. A copy of the signed version of the MACT is available on the U.S. EPA website, http://www.epa.gov/ttn/oarpg/t3pfpr.html.

The source has hydrochloric acid production facilities, which are subject to the above NESHAP.

The provisions of 40 CFR 63 Subpart A - General Provisions dated July 1 1998 edition, which are incorporated as 326 IAC 20-1-1, apply to the affected source described in this section except when otherwise specified in 40 CFR 63 Subpart NNNNN.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification nine months prior to the compliance date for the MACT that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart NNNNN, the Permittee shall submit:

The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart NNNNN:

(1) CS 2060 Hydrochloric Acid Tower
(2) TP-2060 Acid Tower Feed Water Tank
(3) TP-2033 Hydrochloric Acid Tower Product Tank
(4) TP-2061, 2062, 2065 & 2066 Scrubbers (TP 2065 and TP 2066 are back up scrubbers).
(5) TP-1030 Tank Farm Acid Loading Scrubber
(6) TS 1090, 1091, 1093 Muriatic Acid Storage Tanks (three storage tanks)
(7) The hydrochloric acid vent line going from the tank wagon over to the Tank Farm Scrubber TP-1030

Pursuant to 40 CFR 63.9045,

(a) the Permittee shall submit all of the notifications in Sec. Sec. 63.7(b) and (c), 63.8(f)(4) and (6), and 63.9 (b) through (h) that apply to this source by the dates specified;

(b) As specified in Sec. 63.9(b)(2), the Permittee shall submit an Initial Notification not later than 120 calendar days after April 17, 2003;

(c) the Permittee shall submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, as required in Sec. 63.7(b)(1);

(d) If a performance test is required as specified in Table 3 to this subpart, the Permittee shall submit a Notification of Compliance Status according to Sec. 63.9(h)(2)(ii);

(e) the Permittee shall submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th calendar day following the completion of the performance test according to Sec. 63.10(d)(2); and

(f) the Notification of Compliance Status shall also include the information in paragraph (f)(1) through (2) of this section

(1) each operating parameter value averaged over the full period of the performance test (for example, average pH).

(2) each operating parameter range within which HAP emissions are reduced to the level corresponding to meeting the applicable emission limits in Table 1 to this subpart.